South Site Remediation
Findings/Remedial Action Report
Lenox China
Pomona, Atlantic County, New Jersey

South Site Remediation Findings/Remedial Action Report Lenox China Pomona, Atlantic County, New Jersey

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1. INTRODUCTION

The South Site is located directly south of the Lenox China (Lenox) facility on Tilton Road in Pomona, Galloway Township, Atlantic County, New Jersey. The South Site is not a part of the Lenox Facility, rather it is an approximately one acre tract of land which is contiguous to the Lenox facility as shown in Figure 1 - Site Location Map. A Remedial Action Work Plan (RAWP) was submitted to and approved by the New Jersey Department of Environmental Protection (NJDEP) prior to the start of remedial activities in October 1996. The site was included in an amendment to the Memorandum of Agreement, Case #: 95-6-29-0905-37, dated December 9, 1996 covering remedial work at the facility. A Pinelands Certificate of Filing for the project was received January 2, 1997. Temporary approval to discharge water, from dewatering the pit, to sewage, was issued by the Atlantic County Utilities Authority (ACUA) with the concurrence of the Township of Galloway, Municipal Utilities Authority, and the NJDEP Department of Water Quality (DWQ). Copies of the RAWP, Ammendment to the Memorandum of Agreement, Pinelands Certificate of Filing, etc. ACUA Approval Letter are included in Appendix A.

This report was prepared in accordance with NJAC 7:26E-6.6 - Remedial Action Report. Lenox has completed clean closure of the South Site as shown in Figure 2 - Site Map in accordance with the work plan approved by the NJDEP (see Appendix A).

2. REMEDIAL ACTION DESCRIPTION

Remedial action at the South Site consisted of the excavation and off-site disposal of soil/china materials excavated from the Pit/Dredge Area as shown in Figure 2. The materials were removed utilizing an excavator and/or loader. Excavation continued until unaffected (non-china containing) soils were encountered. Initially materials were excavated and loaded into eight lined and covered roll-off containers and stored on Lenox property pending laboratory analysis. Based on the laboratory results, the excavated materials were disposed/recycled at appropriate off-site facilities as described in 3. SOURCE REMOVAL below. Subsequently, all materials excavated were either stockpiled on a temporary storage pad or stockpiled within the excavation and loaded directly onto trailer trucks for transportation.

The remaining remedial action at the South Site consisted of removal of the china chips and recyclable materials from soil in the Flat Area shown in Figure 2. These materials were removed utilizing soil screening equipment. The china chips and recyclable materials removed were disposed/recycled at an appropriate off-site facility.

Remedial activities were verified through the collection and laboratory analysis of soil confirmation samples. The number and location of the final confirmation samples were as shown in Figure 3 – Grid Sampling Locations and Post Excavation Results. Wherever surficial samples indicated that remaining soils had total lead levels above the New Jersey

Residential Direct Contact Soil Cleanup Criteria (RDCSCC) of 400 mg/Kg, additional soil was removed followed by a second round of confirmation samples.

The soils at the South Site consist primarily of relatively high permeability sand. The site is generally flat. Therefore, it was not anticipated that surface water runoff would pose a problem. In fact, surface water runoff from the Plant and areas around the South Site were being directed to a drainage swale on the South Site where it infiltrated into the groundwater. Considering these conditions, final erosion and sedimentation control for the remedial action consisted of grading from the margins of the site to a central depression with supplementary seeding and mulching, as required.

3. SOURCE REMOVAL

A significant amount of the soil in the Pit/Dredge Area, as shown in Figure 2, (ultimately 8,600 tons) was determined not suitable for screening and/or recycle. It was excavated and manifested off-site to permitted TSD Facilities for treatment and landfill disposal. This was determined by sampling, field-testing and, eventually, by obvious appearances. First, grade level, overlying soils, containing broken china, molds and other Lenox materials were stripped and stockpiled in the Flat Area for further evaluation and processing. Second, unsuitable soils were excavated until the bottom and all edges of the original Pit were encountered. Table 1 - Hazardous Waste - presents a listing of all hazardous wastes sent to TSD Facilities. Table 2 - Recycle Materials - Shipped Off Site presents a listing of the non-hazardous materials sent for recycling.

4. SAMPLING AND ANALYSIS

Samples were taken at the NJDEP approved grid points, as shown in Figure 3, at various depths in order to establish at what depth clean soil existed. (Clean soil is defined as soil, which has a total lead concentration less than the RDCSCC criteria of 400 mg/Kg.) Where there were no overlying industrial residues, the grade level grid point samples were sent to an outside, certified laboratory for analysis using an approved method per the New Jersey Technical Regulations. The remainder of the grid points were sampled after removing overlying soils and homogenizing the underlying soils. These results are presented in Table 3 - Post Excavation Soil Results and Figure 3. All analytical results presented in this report are from ACCU-Test Laboratories, Dayton, NJ. In compliance with N.J.A.C.7:26E-2.1, the data in Table 3 is also being submitted in Electronic GIS Format on the 3.5" disketts included in this report.

An expedited field-test procedure (see Appendix B) for total lead was routinely performed to evaluate samples taken for process control and before any samples were sent to ACCU-Test for certification. The Lenox laboratory performed numerous field tests on samples throughout the course of this project in order to expedite the clean-up. The results of this analytical work are not presented in this report, as the expedited procedure employed by the Lenox laboratory was not an approved standard method. Field test results have been retained along with other documentation of the work (photographs, workplans, pile

locations and daily logs) and are available for inspection at Lenox Technical Services in Pomona, NJ.

As reported to the New Jersey Department of Environmental Protection, approximately seven cubic feet of a black asphaltic substance was found during the course of the excavation. Analysis by an outside, certified laboratory showed that this material contained low levels of trichloroethylene (TCE), at 8420000 ppb (<1%). This substance was segregated from all the other soils and eventually sent to a hazardous waste incinerator for disposal. The hazardous waste manifest information is presented in Table 1.

?

5. DECONTAMINATION

Once the depth and appearance of clean soil were determined, excavation of remaining soils, exceeding the RDCSCC, proceeded. The excavated soil was placed in various stockpiles on the site, at grade level, for further processing. All areas on the grid, where soils were removed, were resampled at the agreed sampling points. These analytical results are included in Table 3 and Figure 3. Note that due to concerns about the uniformity of the interface soils, four samples were taken within a one-foot radius of the agreed sample point. One of the four samples was arbitrarily selected for analysis. As agreed in advance with the NJDEP Case Manager, if any sample was found to indicate a hot spot, the three remaining samples would be separately analyzed and the results averaged. As no one sample ever exceeded the maximum value allowed by the New Jersey Technical Requirements for Site Remediation, N.J.A.C. 26:E, none of the remaining three samples was ever analyzed. However, for various reasons, duplicate sets of samples were taken and analyzed for some of the points. All certified analysis results for each point are presented in Table 3 and the average value is shown in Figure 3.

Due to the necessity to dewater areas during excavation (where either the bottom of the pit was at or below the high ground water levels and/or the need to sequentially excavate and re-bed lengths of two large utility pipes which cross the site) some areas were over-excavated to the clean soil depths that had been previously determined by sampling. Before backfilling, these excavated areas were representatively sampled and composited for analysis. Then the area was immediately backfilled and compacted with either clean soil from off-site or processed soil, which had been previously certified to meet the RDCSCC. NJDEP representatives witnessed this procedure on July 7, 1997 for the major portion of the utility pipes.

Recyclable materials, that were screened from the excavated soils, were sampled and tested to determine the level of soil removal required to assure that they met the RDCSCC criteria. This was achieved by drying the sample to remove physical water, placing the material into a rubber lined jar mill and rolling the mill until all of the remaining soils had been removed. The materials were then screened by hand to remove the loose soil. The two fractions were weighed. The soil was sampled and analyzed for total lead. The mass of the total lead in the soil was calculated and compared to the total weight of the two

fractions to determine if the as screened material met the RDCSCC criteria before sending the material for recycle.

A temporary Materials Storage Area and a Truck and Equipment Decontamination pad were constructed as shown in the RAWP. These facilities were decontaminated, the liners removed and disposed and the facilities dismantled. Samples were taken from the underlying soils and composited for each facility to demonstrate that no release had taken place. This data is included in Table 4 – Certified Laboratory Results.

6. SOIL PROCESSING

Initially, stockpiled soils were visually inspected to determine whether screening could possibly reduce the lead content to below the RDCSCC for ultimate placement on the South Site - and/or - to reduce the volume of impacted material by separating out recyclable construction debris (logs, lumber, bricks, concrete and asphaltic concrete) and other clean materials for recycling to concrete aggregate and highway sub-base facilities. If at this or any later processing stage, the RDCSCC criteria could not be efficiently achieved, those soils were manifested to TSD Facilities.

After selected soil stockpiles were processed by screening, they were sampled and field tested to determine whether screening had achieved the RDCSCC criteria or if further processing would efficiently achieve levels below the RDCSCC. In order to produce a uniform sample for analysis, the processed soil was spread on a clean surface and homogenized in-place prior to final sampling. Soils, which met the RDCSCC, were stockpiled on-site. After certification of the sample by the outside laboratory, the soil was eventually placed back on the South Site. Table 4 includes these certified soil test results. Only soil which met the RDCSCC criteria was placed on the South Site.

7. PIT DEWATERING, WATER TREATMENT AND DISPOSAL

Prior to proceeding with the remediation, stormwater from the plant and grounds was diverted, by means of a large trench as shown on Figure 2, to the existing 100-year flood, stormwater containment dike to the north at the back of the plant property. However, it was still anticipated that surface and ground waters from the South Site, itself, would collect in the remedial excavation area. In order to remove water from the remedial excavation during the course of the work, two water collection sumps were excavated in the existing swale. A pumping, pH adjustment, chemical additions and final filtration station was constructed on the plant end of the site and a metered discharge line was connected to an existing plant sewage lift station.

A temporary permit was obtained for connection of this discharge to the ACUA sewage collection and treatment system. The permit included limitations on daily discharge volumes, duration of discharge, pH, total suspended solids (TSS) and total lead. Composite samples were taken and analyzed daily during pumping and the volume, pH,

TSS and lead results were reported daily to ACUA (see Table 5 - South Site Water Sampling).

During the deepest remedial excavation and decontamination of the soils and gravel surrounding the sump areas prior to backfilling and abandoning the sumps, it was necessary to pump and contain a larger volume of water than could be treated and discharged in any one day under the permit. A temporary earthen dike was constructed over the utility pipelines to the north of the site and double lined to contain the water. Using large trash pumps, groundwater was successfully removed for the final excavation and decontamination of the remedial excavation. Water in the temporary containment was treated and discharged to sewage. The temporary containment was washed clean, the liners removed and the earthen dike removed. The underlying soil was sampled and tested to confirm that no release had occurred.

8. GROUNDWATER SAMPLING

When the remediation work had been completed, four Geo-probe wells were temporarily placed and sampled at the locations shown on Figure 3. NJDEP representatives were on site to witness the groundwater sampling. All results of this sampling were below 1 ppb for TCE and 10 ppb for lead. The analytical results and methodology are reported in Appendix C.

9. CONCLUSIONS

- > The results shown in Table 3 clearly demonstrate that all contaminated materials were successfully removed to below the RDCSCC level and that the underlying soils meet the RDCSCC criteria.
- > The results shown in Table 4 clearly demonstrate that all processed soils placed on site were certified by the outside laboratory to meet the RDCSCC criteria.
- > The results shown in Appendix C clearly demonstrate that groundwater at the site has not been impacted.

FIGURE 1: SITE MAP

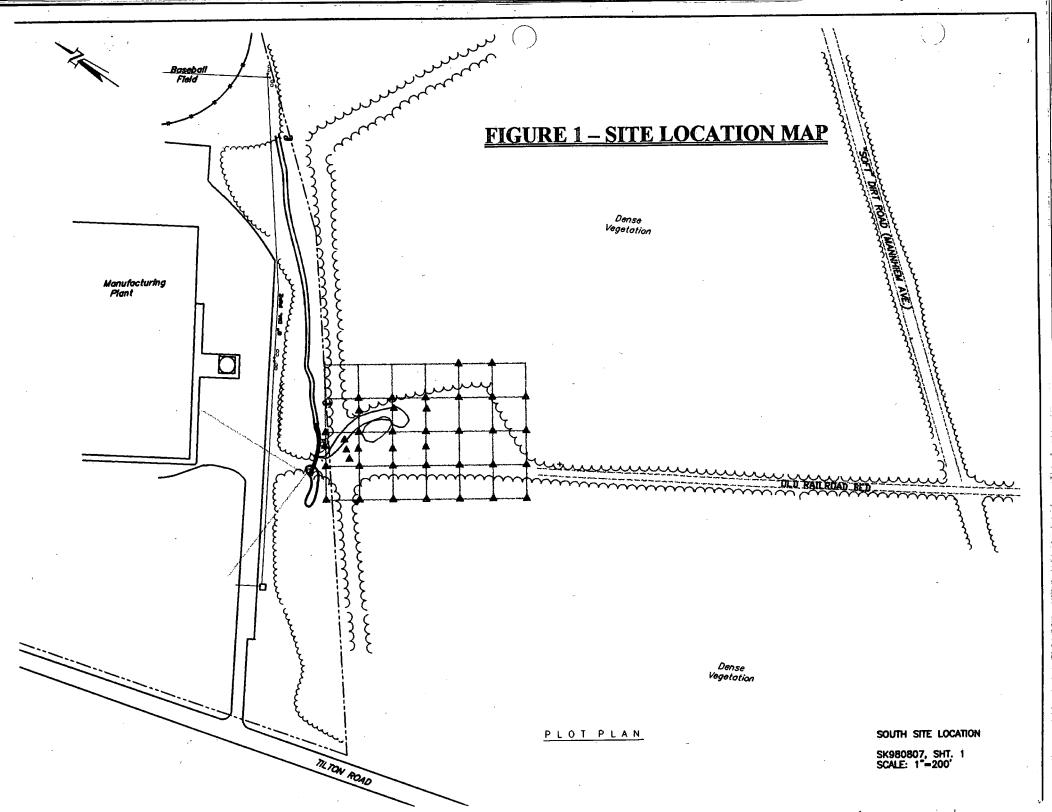
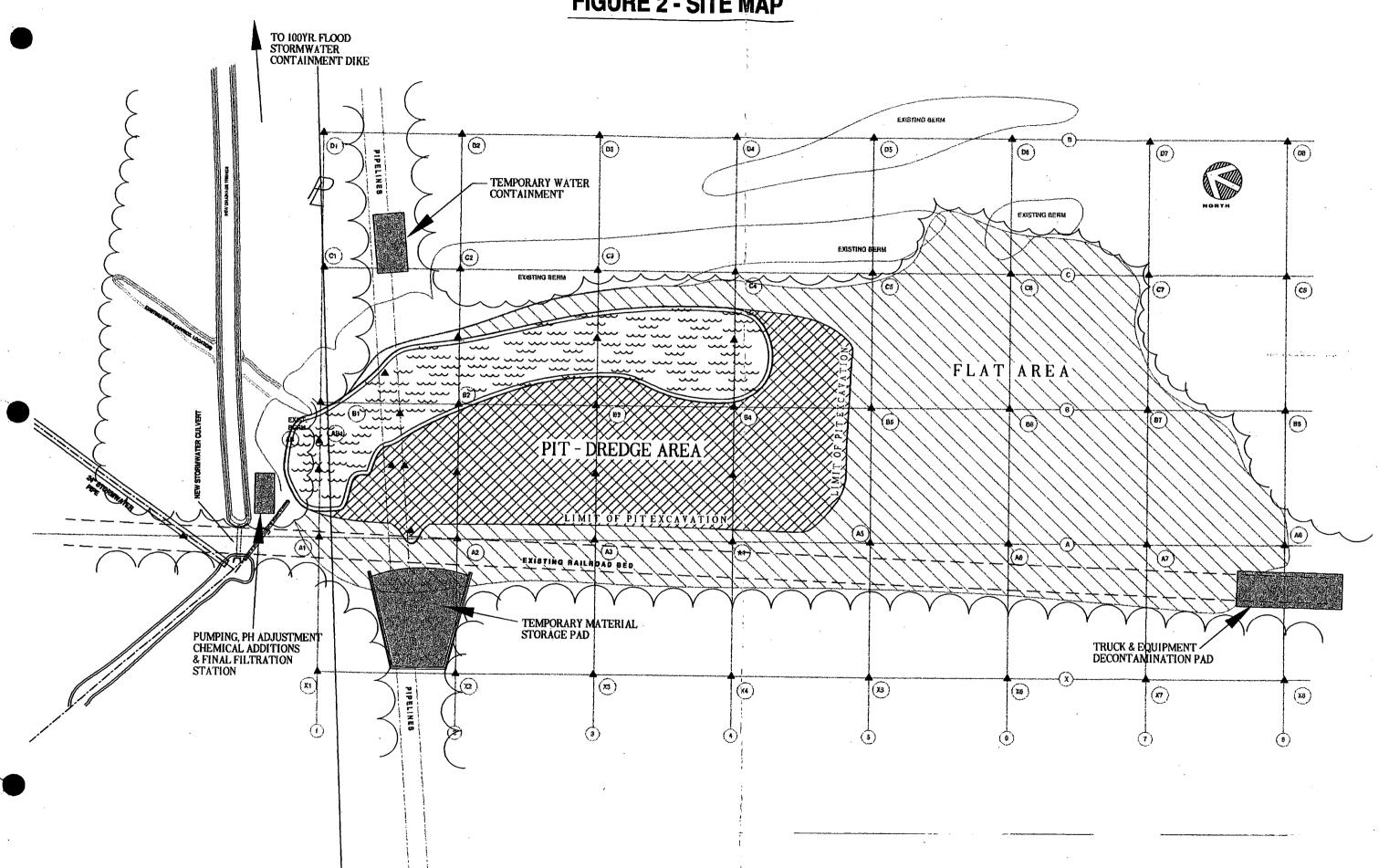


FIGURE 2: SAMPLE LOCATIONS

FIGURE 2 - SITE MAP



GRID SAMPLE LOCATIONS & POST EXCAVATION RESULTS

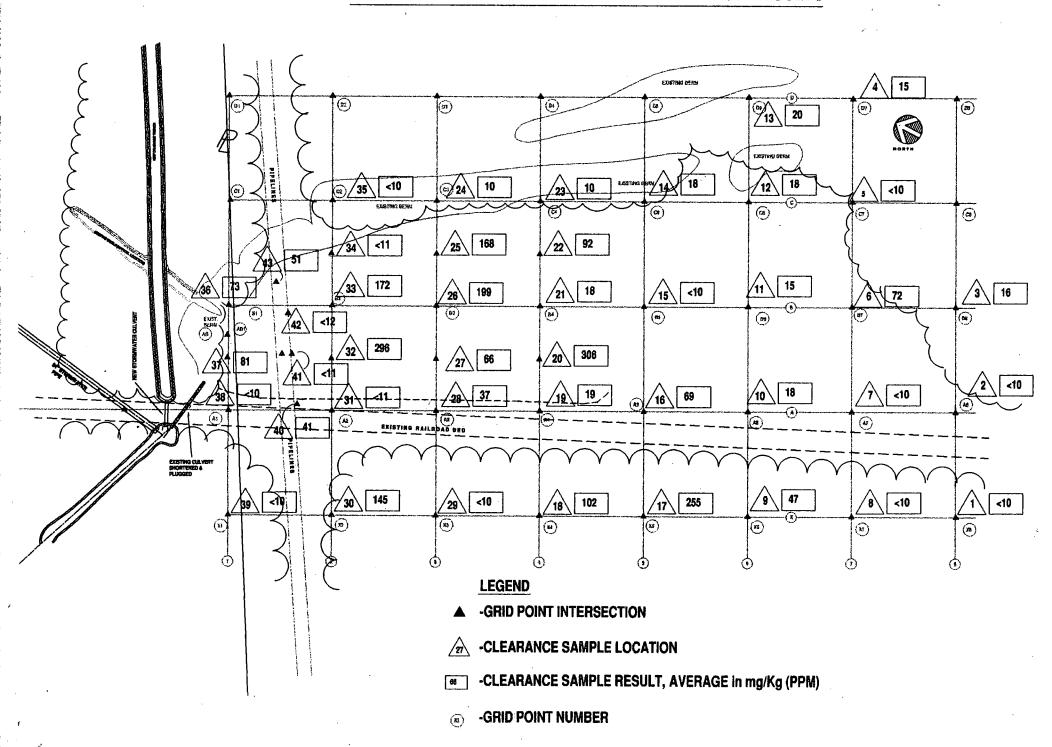


TABLE 1: MANIFESTS

| TABLE 1. HAZARDOUS WASTE - OFF SITE SHIPMENTS | | | | | | | |
|---|------------------|----------|----------------------|--|--|--|--|
| | | | | | | | |
| STATE | GENERATOR | TSD | | WASTE | | | |
| MANIFEST | MANIFEST | FACILITY | SHIPPED | SHIPPED | | | |
| DOCUMENT # | DOCUMENT | COMPANY | DATE | IN TONS | TRANSPORTER | | |
| NYB 5067288 | 96010 | CWM | 10/23/96 | 18.08 | FREEHOLD CARTAGE, INC. | | |
| NYB 5067297 | 96010 | CWM | 10/31/96 | 18.39 | FREEHOLD CARTAGE, INC. | | |
| NYB 8733321 | 96011 | CWM | 11/4/96 | 18.61 | FREEHOLD CARTAGE, INC. | | |
| NYB 8733411 | 96014 | CWM | 11/7/96 | 16.98 | S & J TRANSPORATION | | |
| NYB 8733339 | 96015 | CWM | 11/8/96 | 18.43 | S & J TRANSPORATION | | |
| NYB 8733357 | 96016 | CWM | 11/18/96 | 17.21 | S & J TRANSPORATION | | |
| NYB 8733348 | 96017 | CWM | 11/18/96 | 17.21 | S & J TRANSPORATION S & J TRANSPORATION | | |
| NYB 8733366 | 96011 | CWM | 11/20/96 | 17.29 | | | |
| NYB 2688210 | 97015 | CWM | 02/12/97 | 22.69 | S & J TRANSPORATION S & J TRANSPORATION | | |
| NYB 2688228 | 97016 | CWM | 02/12/97 | 22.48 | S & J TRANSPORATION S & J TRANSPORATION | | |
| NYB 2688273 | 97017 | CWM | 02/13/97 | 21.21 | S & J TRANSPORATION S & J TRANSPORATION | | |
| NYB 2688930 | 97019 | CWM | 02/24/97 | 22.67 | S & J TRANSPORATION | | |
| NYB 2688912 | 97020 | CWM | 02/24/97 | | S & J TRANSPORATION | | |
| NYB 2688714 | 97021 | CWM_ | 02/24/97 | 21.71 | S & J TRANSPORATION | | |
| NYB 2688921 | 97022 | CWM | 02/25/97 | 22.49 | S & J TRANSPORATION | | |
| NYB 2688957 | 97023 | CWM | 02/25/97 | | S & J TRANSPORATION | | |
| NYB 2688948 | 97024 | CWM | 02/25/97 | 23.31 | BUFFALO FUEL CORP. | | |
| NYB 8773209 | 97018 | CWM | 02/26/97 | 23.84 | BUFFALO FUEL CORP. | | |
| NYB 8773191 | 97025 | CWM | 02/26/97 02/26/97 | | S & J TRANSPORATION | | |
| NYB 8773218 | 97026 | CWM | 02/26/97 | 21.22 | S & J TRANSPORATION | | |
| NYB 8773236 | 97027 | CWM | 02/20/97 | 20.67 | BUFFALO FUEL CORP. | | |
| NYB 8773182 | 97028 | CWM | 02/27/97 | 22.22 | S & J TRANSPORATION | | |
| NYB 8773227 | 97029 | CWM | 02/28/97 | 22.95 | S & J TRANSPORATION | | |
| NYB 8773146 | 97030 97031 | CWM | 02/28/97 | 22.62 | BUFFALO FUEL CORP. | | |
| NYB 8773128 | 97031 | CWM | 02/28/97 | 22.13 | S & J TRANSPORATION | | |
| NYB 8773173 | | CWM | 03/03/97 | | S & J TRANSPORATION | | |
| NYB 8773038 | 97034 | CWM | 03/03/97 | | BUFFALO FUEL CORP. | | |
| NYB 8773002 | 97035 | CWM | 03/03/97 | | S & J TRANSPORATION | | |
| NYB 8773029 NYB 8773011 | 97036 | CWM | 03/04/97 | | HORWITH TRUCKS, INC | | |
| NYB 8772993 | 97037 | CWM | 03/04/97 | | HORWITH TRUCKS, INC | | |
| NYB 8772975 | 97038 | CWM | 03/04/97 | | HORWITH TRUCKS, INC | | |
| NYB 8772966 | 97039 | CWM | 03/04/97 | | HORWITH TRUCKS, INC | | |
| NYB 8772957 | 97040 | CWM | 03/04/97 | | HORWITH TRUCKS, INC | | |
| NYB 8772858 | 97041 | CWM | 03/05/97 | | HORWITH TRUCKS, INC | | |
| NYB 8772849 | 97042 | CWM | 03/05/97 | | BUFFALO FUEL CORP. | | |
| NYB 8772831 | 97043 | CWM | 03/05/97 | | BUFFALO FUEL CORP. | | |
| NYB 8772822 | 97044 | CWM | 03/05/97 | | HORWITH TRUCKS, INC | | |
| NYB 8772813 | 97045 | CWM | 03/05/97 | | HORWITH TRUCKS, INC | | |
| NYB 8772795 | 97046 | CWM | 03/05/97 | | HORWITH TRUCKS, INC | | |
| NYB 8772804 | 97047 | CWM | 03/05/97 | | RANK'S VACUUM TRUCK SER | | |
| NYB 8773083 | 97048 | CWM | 03/06/97 | + | RANK'S VACUUM TRUCK SER | | |
| NYB 8696673 | 97049 | CWM | 03/06/97 | | BUFFALO FUEL CORP. | | |

| TABLE 1. HAZARDOUS WASTE - OFF SITE SHIPMENTS | | | | | | |
|---|-------------|------------------|----------|----------|--------------|--|
| | | | | | | |
| _ | STATE | GENERATOR | TSD | ļ | WASTE | |
| 7 | MANIFEST | MANIFEST | FACILITY | SHIPPED | SHIPPED | |
| Ţ | DOCUMENT # | DOCUMENT | COMPANY | DATE | IN TONS | TRANSPORTER |
| Γ | NYB 8772894 | 97050 | CWM | 03/06/97 | 22.93 | BUFFALO FUEL CORP. |
| | NYB 8772885 | 97051 | CWM | 03/06/97 | 22.31 | BUFFALO FUEL CORP. |
| Γ | NYB 8772876 | 97052 | CWM | 03/06/97 | 22.16 | HORWITH TRUCKS, INC |
| | NYB 8772867 | 97053 | CWM | 03/06/97 | 24.12 | HORWITH TRUCKS, INC |
| | NYB 8696664 | 97054 | CWM | 03/06/97 | 23.86 | HORWITH TRUCKS, INC |
| | NYB 8696655 | 97055 | CWM | 03/06/97 | 22.78 | HORWITH TRUCKS, INC |
| | NYB 8772939 | 97056 | CWM | 03/07/97 | 23.38 | HORWITH TRUCKS, INC |
| | NYB 8772921 | 97057 | CWM | 03/07/97 | 23.96 | HORWITH TRUCKS, INC |
| - | NYB 8772912 | 97058 | CWM | 03/07/97 | 22.84 | HORWITH TRUCKS, INC |
| - | NYB 8772903 | 97059 | CWM | 03/07/97 | 23.82 | HORWITH TRUCKS, INC |
| _ | NYB 8696619 | 97060 | CWM | 03/07/97 | 21.93 | HORWITH TRUCKS, INC |
| | NYB 8696646 | 97061 | CWM | 03/07/97 | 22.76 | HORWITH TRUCKS, INC |
| _ | NYB 8773074 | 97062 | CWM | 03/07/97 | 22.32 | HORWITH TRUCKS, INC |
| _ | NYB 8773092 | 97063 | CWM | 03/07/97 | 23.66 | RANK'S VACUUM TRUCK SER |
| - | NYB 8697573 | 97064 | CWM | 03/10/97 | 22.23 | RANK'S VACUUM TRUCK SER |
| L | NYB 8697582 | 97065 | CWM | 03/10/97 | 23.60 | BUFFALO FUEL CORP. |
| L | NYB 8696745 | 97066 | CWM | 03/10/97 | 21.55 | BUFFALO FUEL CORP. |
| L | NYB 8696754 | 97067 | CWM | 03/10/97 | 23.00 | HORWITH TRUCKS, INC |
| L | NYB 8696763 | 97068 | CWM | 03/10/97 | 23.81 | HORWITH TRUCKS, INC |
| 7 | NYB 8696772 | 97069 | CWM | 03/10/97 | 22.98 | HORWITH TRUCKS, INC |
| ę | NYB 8696781 | 97070 | CWM | 03/10/97 | 24.73 | HORWITH TRUCKS, INC |
| | NYB 8696799 | 97071 | CWM | 03/10/97 | 23.81 | HORWITH TRUCKS, INC |
| - ⊩ | NYB 8696808 | 97072 | CWM | 03/10/97 | 23.31 | HORWITH TRUCKS, INC HORWITH TRUCKS, INC |
| - | NYB 8696817 | 97073 | CWM | 03/10/97 | | |
| L | NYB 8772948 | 97074 | CWM | 03/10/97 | 24.77 | HORWITH TRUCKS, INC |
| L | NYB 8696718 | 97075 | CWM | 03/10/97 | 22.13 | HORWITH TRUCKS, INC HORWITH TRUCKS, INC |
| L | NYB 8696709 | | CWM | 03/10/97 | | |
| L | NYB 8696691 | 97077 | CWM | 03/10/97 | | BUFFALO FUEL CORP. |
| - | NYB 8696682 | | CWM | 03/10/97 | 22.90 | BUFFALO FUEL CORP. |
| L | NYB 8697663 | | CWM | 03/11/97 | | BUFFALO FUEL CORP. |
| Ļ | NYB 8697654 | | CWM | 03/11/97 | 25.68 | BUFFALO FUEL CORP. |
| - | NYB 8697645 | | CWM | 03/11/97 | | BUFFALO FUEL CORP. |
| - | NYB 8697636 | | CWM | 03/11/97 | | HORWITH TRUCKS, INC |
| L | NYB 8697627 | | CWM | 03/11/97 | | HORWITH TRUCKS, INC |
| L | NYB 8697672 | 97085 * | CWM | 03/11/97 | 24.08 | HORWITH TRUCKS, INC |
| L | NYB 8697681 | 97086 | CWM | 03/11/97 | | HORWITH TRUCKS, INC |
| L | NYB 8697708 | | CWM | 03/11/97 | | HORWITH TRUCKS, INC |
| L | NYB 8697717 | | CWM_ | 03/11/97 | | HORWITH TRUCKS, INC |
| - | NYB 8697699 | | CWM | 03/11/97 | + | HORWITH TRUCKS, INC |
| L | NYB 8773119 | | CWM | 03/11/97 | | HORWITH TRUCKS, INC |
| | NYB 8773101 | 97091 | CWM | 03/11/97 | | HORWITH TRUCKS, INC |
| | NYB 8696727 | 97092 | CWM | 03/11/97 | | HORWITH TRUCKS, INC |
| | NYB 8697591 | 97093 | CWM | 03/11/97 | 24.45 | BUFFALO FUEL CORP. |

| | TE SHIPMENTS | | | | | |
|--|------------------------|---------------------------------------|------------|-------------|----------------|--|
| | | | | | | |
| | STATE | GENERATOR | | 0.000000 | WASTE | |
| | ANIFEST | MANIFEST | FACILITY | SHIPPED | SHIPPED | TRANSPORTER |
| | | DOCUMENT | COMPANY | DATE | IN TONS | TRANSPORTER |
| | B 8696547 | 97094 | CWM | 03/12/97 | 22.11 | BUFFALO FUEL CORP. |
| | B 8696502 | 97095 | CWM | 03/12/97 | 23.68 | BUFFALO FUEL CORP. BUFFALO FUEL CORP. |
| | B 8696421 | 97096 | CWM | 03/12/97 | 24.72 | BUFFALO FUEL CORP. |
| | B 8696439 | 97097 * | CWM | 03/12/97 | 26.16 | |
| | B 8696448 | 97098 | <u>CWM</u> | 03/12/97 | 23.73 | HORWITH TRUCKS, INC HORWITH TRUCKS, INC |
| | B 8696457 | 97099 * | CWM | 03/12/97 | 24.58 | HORWITH TRUCKS, INC |
| | B 8696466 | 97100 | CWM | 03/12/97 | 23.53 | HORWITH TRUCKS, INC |
| | B 8696475 | 97101 | CWM | 03/12/97 | 23.30 | HORWITH TRUCKS, INC |
| | B 8696493 | 97102 | CWM | 03/12/97 | 23.18 | HORWITH TRUCKS, INC |
| | B 8696484 | 97103 | CWM | 03/12/97 | 23.07 | HORWITH TRUCKS, INC |
| | B 8696556 | 97104 | CWM | 03/12/97 | 23.54 | HORWITH TRUCKS, INC |
| | B 8696538 | 97105 | CWM | 03/12/97 | 22.86 23.23 | HORWITH TRUCKS, INC |
| | B 8696529 | 97106 | CWM | 03/12/97 | 23.23 | BUFFALO FUEL CORP. |
| | B 8696511 | 97107 | CWM | 03/12/97 | 22.96 | BUFFALO FUEL CORP. |
| | B 8696628 | 97108 | CWM | 03/12/97 | 21.92 | BUFFALO FUEL CORP. |
| | B 8696637 | 97109 | CWM | 03/12/97 | 26.54 | BUFFALO FUEL CORP. |
| | B 8696358 | 97110 | CWM | 03/13/97 | 24.62 | RANK'S VACUUM TRUCK SER |
| | B 8696349 | 97111 | CWM | 03/13/97 | 23.45 | RANK'S VACUUM TRUCK SER |
| | B 8696331 | 97112 | CWM | | 24.18 | HORWITH TRUCKS, INC |
| | B 8696322 | 97113 | CWM | 03/13/97 | 23.58 | HORWITH TRUCKS, INC |
| | B 8696304 | 97114 | CWM | 03/13/97 | 24.53 | HORWITH TRUCKS, INC |
| | B 8696295 | 97115 | CWM | 03/13/97 | 24.26 | HORWITH TRUCKS, INC |
| | B 8696286 | 97116 | CWM | 03/13/97 | 22.73 | HORWITH TRUCKS, INC |
| | B 8696277 | 97117 97118 | CWM | 03/13/97 | 23.61 | HORWITH TRUCKS, INC |
| | B 8696268 B 8696259 | 97119 * | CWM | 03/13/97 | 23.15 | HORWITH TRUCKS, INC |
| | | | CWM | 03/13/97 | | HORWITH TRUCKS, INC |
| | B 8696736 | 97121 | CWM | 03/13/97 | | HORWITH TRUCKS, INC |
| | B 8697609 | 97122 | CWM | 03/13/97 | 25.52 | HORWITH TRUCKS, INC |
| | B 8697618 B 8696205 | | CWM | 03/13/97 | 22.21 | BUFFALO FUEL CORP. |
| | B 8696214 | | CWM | 03/13/97 | 21.26 | BUFFALO FUEL CORP. |
| | B 8696223 | 97125 | CWM | 03/13/97 | | BUFFALO FUEL CORP. |
| | B 8697906 | | CWM | 03/14/97 | | BUFFALO FUEL CORP. |
| | B 8697915 | 97127 | CWM | 03/14/97 | | BUFFALO FUEL CORP. |
| | B 8697924 | 97128 | CWM | 03/14/97 | 23.21 | BUFFALO FUEL CORP. |
| | B 8697933 | · · · · · · · · · · · · · · · · · · · | CWM | 03/14/97 | | HORWITH TRUCKS, INC |
| | B 8697987 | 97130 | CWM | 03/14/97 | | HORWITH TRUCKS, INC |
| | B 8697978 | | CWM | 03/14/97 | | HORWITH TRUCKS, INC |
| | B 8697969 | | CWM | 03/14/97 | | HORWITH TRUCKS, INC |
| | B 8697951 | 97133 | CWM | 03/14/97 | | HORWITH TRUCKS, INC |
| | B 8697942 | 97134 | CWM | 03/14/97 | | HORWITH TRUCKS, INC |
| | B 8696565 | | CWM | 03/14/97 | | HORWITH TRUCKS, INC |
| | B 8696574 | | CWM | 03/14/97 | | HORWITH TRUCKS, INC |

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| | i | | TABLE 1. HAZARDOUS WASTE - OFF SITE | | | | | | |
|---------------------------------------|---|--|-------------------------------------|---|--|--|--|--|--|
| | | | | | | | | | |
| STATE GENERA | | | WASTE | | | | | | |
| MANIFEST MANIF | | SHIPPED | SHIPPED | TRANSPORTER | | | | | |
| DOCUMENT # DOCUME | | DATE | IN TONS | TRANSPORTER | | | | | |
| NYB 8698023 9713 | | 03/14/97 | 23.60 | HORWITH TRUCKS, INC | | | | | |
| NYB 8698032 9713 | | 03/14/97 | 22.17 | BUFFALO FUEL CORP. | | | | | |
| NYB 8697888 9714 | | 03/14/97 | 21.86 | BUFFALO FUEL CORP. | | | | | |
| NYB 8697897 9714 | | 03/14/97 | 22.43 | BUFFALO FUEL CORP. | | | | | |
| NYB 8697105 9714 | | 03/17/97 | 25.12 | BUFFALO FUEL CORP. | | | | | |
| NYB 8697114 9714 | | 03/17/97 | 24.56 | RANK'S VACUUM TRUCK SER | | | | | |
| NYB 8697123 9714 | | 03/17/97 | 21.94 | RANK'S VACUUM TRUCK SER | | | | | |
| NYB 8697132 9714 | | 03/17/97 | 24.34 | HORWITH TRUCKS, INC | | | | | |
| NYB 8697726 97146 | | 03/17/97 | 24.35 | HORWITH TRUCKS, INC | | | | | |
| NYB 8697735 9714 | | 03/17/97 | 24.69 | HORWITH TRUCKS, INC | | | | | |
| NYB 8697744 9714 | | 03/17/97 | 23.97 | HORWITH TRUCKS, INC | | | | | |
| NYB 8697753 9714 | | 03/17/97 | 21.84 | HORWITH TRUCKS, INC HORWITH TRUCKS, INC | | | | | |
| NYB 8697762 9715 | | 03/17/97 | 23.70 | HORWITH TRUCKS, INC | | | | | |
| NYB 8697771 9715 | | 03/17/97 | 24.62 | HORWITH TRUCKS, INC | | | | | |
| NYB 8696232 9715 | | 03/17/97 | 23.10 | HORWITH TRUCKS, INC | | | | | |
| NYB 8696241 9715 | | 03/17/97 | 22.32 | HORWITH TRUCKS, INC | | | | | |
| NYB 8697807 97154 | | 03/17/97 | 23.84 23.86 | HORWITH TRUCKS, INC | | | | | |
| NYB 8697816 9715 | | 03/17/97 | 23.94 | HORWITH TRUCKS, INC | | | | | |
| NYB 8697825 9715 | | 03/17/97 | 23.24 | HORWITH TRUCKS, INC | | | | | |
| NYB 8697834 9715 | | 03/17/97 | 23.24 | HORWITH TRUCKS, INC | | | | | |
| NYB 8697843 9715 | | 03/17/97 | 25.24 | HORWITH TRUCKS, INC | | | | | |
| NYB 8697852 97159 | | 03/17/97 | 22.64 | BUFFALO FUEL CORP. | | | | | |
| NYB 8697861 97160 | | 03/18/97 | 23.88 | BUFFALO FUEL CORP. | | | | | |
| NYB 8697879 9716 | | 03/18/97 | 24.49 | BUFFALO FUEL CORP. | | | | | |
| NYB 8696907 9716 | | 03/18/97 | 22.34 | BUFFALO FUEL CORP. | | | | | |
| NYB 8696916 9716 | | 03/18/97 | | BUFFALO FUEL CORP. | | | | | |
| NYB 8696925 9716 | | 03/18/97 | 24.59 | HORWITH TRUCKS, INC | | | | | |
| NYB 8696934 97169 | | 03/18/97 | | HORWITH TRUCKS, INC | | | | | |
| NYB 8696943 9716 NYB 8696952 9716 | | 03/18/97 | | HORWITH TRUCKS, INC | | | | | |
| | | 03/18/97 | 24.78 | HORWITH TRUCKS, INC | | | | | |
| NYB 8696961 9716 | | 03/18/97 | 21.85 | HORWITH TRUCKS, INC | | | | | |
| NYB 8696979 9716 NYB 8696988 97170 | | 03/18/97 | 24.69 | HORWITH TRUCKS, INC | | | | | |
| | | 03/18/97 | 22.88 | HORWITH TRUCKS, INC | | | | | |
| NYB 8696997 9717 NYB 8697006 9717 | | 03/18/97 | 23.37 | HORWITH TRUCKS, INC | | | | | |
| NYB 8697015 9717 | | 03/18/97 | 22.68 | HORWITH TRUCKS, INC | | | | | |
| NYB 8697015 9717 | | 03/18/97 | 23.28 | HORWITH TRUCKS, INC | | | | | |
| NYB 8698014 9717 | | 03/18/97 | 23.78 | HORWITH TRUCKS, INC | | | | | |
| NYB 8697033 9717 | | 03/18/97 | 24.15 | HORWITH TRUCKS, INC | | | | | |
| NYB 8697051 9717 | | 03/18/97 | 25.08 | HORWITH TRUCKS, INC | | | | | |
| NYB 8698005 9717 | | 03/18/97 | 23.80 | BUFFALO FUEL CORP. | | | | | |
| NYB 8697069 9717 | | 03/18/97 | 22.30 | BUFFALO FUEL CORP. | | | | | |
| NYB 8697078 9718 | | 03/18/97 | 23.69 | BUFFALO FUEL CORP. | | | | | |

| STATE GENERATOR TSD WASTE MANIFEST MANIFEST FACILITY SHIPPED SHIPPED DOCUMENT # DOCUMENT COMPANY DATE IN TONS TRANSPORTE NYB 8697996 97181 CWM 03/19/97 23.88 BUFFALO FUEL COMPANY NYB 8698041 97182 CWM 03/19/97 23.89 RANK'S VACUUM TR NYB 8698059 97183 CWM 03/19/97 26.00 RANK'S VACUUM TR NYB 8696367 97184 CWM 03/19/97 22.89 HORWITH TRUCK NYB 8696376 97185 CWM 03/19/97 24.32 HORWITH TRUCK | CORP. RUCK SER RUCK SER |
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| MANIFEST MANIFEST FACILITY SHIPPED SHIPPED DOCUMENT # DOCUMENT COMPANY DATE IN TONS TRANSPORTE NYB 8697996 97181 CWM 03/19/97 23.88 BUFFALO FUEL COMPANY NYB 8698041 97182 CWM 03/19/97 23.89 RANK'S VACUUM TR NYB 8698059 97183 CWM 03/19/97 26.00 RANK'S VACUUM TR NYB 8696367 97184 CWM 03/19/97 22.89 HORWITH TRUCK | CORP. RUCK SER RUCK SER |
| DOCUMENT # DOCUMENT COMPANY DATE IN TONS TRANSPORTE NYB 8697996 97181 CWM 03/19/97 23.88 BUFFALO FUEL COMPANY NYB 8698041 97182 CWM 03/19/97 23.89 RANK'S VACUUM TR NYB 8698059 97183 CWM 03/19/97 26.00 RANK'S VACUUM TR NYB 8696367 97184 CWM 03/19/97 22.89 HORWITH TRUCK | CORP. RUCK SER RUCK SER |
| NYB 8697996 97181 CWM 03/19/97 23.88 BUFFALO FUEL C NYB 8698041 97182 CWM 03/19/97 23.89 RANK'S VACUUM TR NYB 8698059 97183 CWM 03/19/97 26.00 RANK'S VACUUM TR NYB 8696367 97184 CWM 03/19/97 22.89 HORWITH TRUCK | CORP. RUCK SER RUCK SER |
| NYB 8698041 97182 CWM 03/19/97 23.89 RANK'S VACUUM TR NYB 8698059 97183 CWM 03/19/97 26.00 RANK'S VACUUM TR NYB 8696367 97184 CWM 03/19/97 22.89 HORWITH TRUCK | RUCK SER |
| NYB 8698059 97183 CWM 03/19/97 26.00 RANK'S VACUUM TR NYB 8696367 97184 CWM 03/19/97 22.89 HORWITH TRUCK | RUCK SER |
| NYB 8696367 97184 CWM 03/19/97 22.89 HORWITH TRUCK | |
| NIB 0000007 07 10 TO LIGHT TO LOCK | ים ואור ו |
| INYB 8696376 97185 CWM 03/19/9/ 24.32 HORVVIIT INOCK | |
| THE COCCOT OF THE PROPERTY AND THE PROPE | |
| TATE COCCOCC ST. 100 | |
| NTB CCCCCCT C7 TC7 | |
| THE COCCES OF THE STATE OF THE | |
| NYB 8696835 97189 * CWM 03/19/97 24.02 HORWITH TRUCK | |
| NYB 8696844 97190 CWM 03/19/97 23.31 HORWITH TRUCK | |
| NYB 8696853 97191 * CWM 03/19/97 24.04 HORWITH TRUCK | |
| NYB 8696862 97192 CWM 03/19/97 23.01 HORWITH TRUCK | |
| NYB 8696871 97193 * CWM 03/19/97 26.00 HORWITH TRUCK | |
| NYB 8697087 97196 * CWM 03/19/97 24.30 HORWITH TRUCK | |
| NYB 8697096 97197 CWM 03/19/97 23.55 HORWITH TRUCK | |
| NYB 8696583 97198 CWM 03/19/97 23.70 HORWITH TRUCK | |
| NYB 8696592 97199 CWM 03/19/97 21.39 BUFFALO FUEL C | |
| NYB 8696898 97194 CWM 03/20/97 23.18 BUFFALO FUEL C | |
| NYB 8696403 97195 * CWM 03/20/97 23.80 BUFFALO FUEL C | |
| NYB 8696601 97200 CWM 03/20/97 21.97 BUFFALO FUEL C | |
| NYB 8697195 97201 CWM 03/20/97 24.45 HORWITH TRUCK | |
| NYB 8697204 97202 CWM 03/20/97 22.28 HORWITH TRUCK | |
| NYB 8697213 97203 * CWM 03/20/97 24.74 BUFFALO FUEL 0 | |
| NYB 8660592 97204 CWM 03/20/97 22.45 HORWITH TRUCK | KS, INC |
| NYB 8660601 97205 CWM 03/20/97 25.95 HORWITH TRUCK | |
| NYB 8660583 97206 * CWM 03/20/97 25.72 HORWITH TRUCK | KS, INC |
| NYB 8660574 97207 CWM 03/20/97 26.10 HORWITH TRUCK | KS, INC |
| NYB 8660565 97208 CWM 03/20/97 22.43 HORWITH TRUCK | KS, INC |
| NYB 8660556 97209 CWM 03/20/97 23.17 HORWITH TRUCK | KS, INC |
| NYB 8660547 97210 * CWM 03/20/97 24.85 HORWITH TRUCK | KS, INC |
| NYB 8660538 97211 * CWM 03/20/97 23.07 HORWITH TRUCK | KS, INC |
| NYB 8697186 97214 CWM 03/20/97 23.44 HORWITH TRUCK | KS, INC |
| NYB 8697141 97215 * CWM 03/20/97 25.22 HORWITH TRUCK | KS, INC |
| NYB 8697159 97216 CWM 03/20/97 22.49 HORWITH TRUCK | |
| NYB 8697168 97217 * CWM 03/20/97 22.32 BUFFALO FUEL 0 | |
| NYB 8697177 97218 CWM 03/20/97 25.01 BUFFALO FUEL 0 | |
| NYB 8698068 97219 CWM 03/20/97 22.85 BUFFALO FUEL 0 | |
| N1D 0030000 07210 07411 05121 0 51451 0 51451 | |
| NID GOOG TOO STIEL OF THE LOCAL CONTRACTOR OF THE LOCA | |
| NID COCCOZO CIZIZ | |
| NYB 8660511 97213 CWM 03/21/97 23.17 RANK'S VACUUM TE NYB 8660619 97221 CWM 03/21/97 24.13 RANK'S VACUUM TE | |

| | | TABLE 1. H | E SHIPMENTS | | | |
|----------|-----------|------------|-------------|----------|------------------|-------------------------|
| <u> </u> | | | | | MACTE | |
| | STATE | GENERATOR | | SHIPPED | WASTE SHIPPED | |
| - | ANIFEST | MANIFEST | FACILITY | DATE | IN TONS | TRANSPORTER |
| | | DOCUMENT | COMPANY | 03/21/97 | 25.13 | HORWITH TRUCKS, INC |
| | B 8660628 | 97222 | CWM | 03/21/97 | 23.71 | HORWITH TRUCKS, INC |
| | B 8660637 | 97223 | CWM | | 22.50 | HORWITH TRUCKS, INC |
| | B 8660727 | | CWM | 03/21/97 | 27.73 | HORWITH TRUCKS, INC |
| | B 8660646 | 97225 * | CWM | 03/21/97 | 27.46 | HORWITH TRUCKS, INC |
| | B 8660655 | 97226 | CWM | 03/21/97 | 26.72 | HORWITH TRUCKS, INC |
| | B 8660664 | 97227 | CWM | 03/21/97 | 25.01 | HORWITH TRUCKS, INC |
| | B 8660673 | 97228 | CWM | 03/21/97 | 23.56 | HORWITH TRUCKS, INC |
| | B 8660763 | 97231 | | 03/21/97 | 22.29 | HORWITH TRUCKS, INC |
| | B 8660772 | 97232 * | CWM | 03/21/97 | 23.81 | HORWITH TRUCKS, INC |
| | B 8660781 | 97233 | CWM | 03/21/97 | 22.94 | BUFFALO FUEL CORP. |
| | B 8660799 | 97234 | CWM | 03/21/97 | 22.94 | BUFFALO FUEL CORP. |
| | B 8660808 | 97235 | CWM | | 24.42 | BUFFALO FUEL CORP. |
| | B 8660709 | 97236 * | CWM | 03/21/97 | 22.75 | BUFFALO FUEL CORP. |
| | B 8660718 | 97237 | CWM | 03/21/97 | 25.04 | BUFFALO FUEL CORP. |
| | B 8660736 | 97238 | CWM | | 24.11 | PAGE ENV. TRANSPORT CO. |
| | B 8660745 | | CWM | 03/21/97 | 23.58 | PAGE ENV. TRANSPORT CO. |
| | B 8660754 | 97240 | CWM | 03/21/97 | 21.18 | PAGE ENV. TRANSPORT CO. |
| | B 8660682 | 97229 | CWM | 03/24/97 | 22.57 | PAGE ENV. TRANSPORT CO. |
| | B 8660691 | 97230 | CWM | 03/24/97 | 25.24 | PAGE ENV. TRANSPORT CO. |
| | B 8660349 | 97241 | CWM | 03/24/97 | 21.87 | HORWITH TRUCKS, INC |
| | B 8660457 | 97242 | CWM | 03/24/97 | 23.31 | HORWITH TRUCKS, INC |
| | B 8660367 | 97243 | CWM | 03/24/97 | 22.84 | HORWITH TRUCKS, INC |
| | B 8660376 | 97244 | CWM | 03/24/97 | 25.62 | HORWITH TRUCKS, INC |
| | B 8660385 | 97245 | CWM | | 22.84 | HORWITH TRUCKS, INC |
| | B 8660466 | 97246 | CWM | 03/24/97 | | HORWITH TRUCKS, INC |
| | B 8660475 | 97247 | CWM | 03/24/97 | | HORWITH TRUCKS, INC |
| | B 8660412 | 97248 | CWM | 03/24/97 | 25.37 | PAGE ENV. TRANSPORT CO. |
| | B 8660439 | 97250 | CWM | 03/24/97 | 22.19 | PAGE ENV. TRANSPORT CO. |
| | B 8660331 | 97252 * | CWM | 03/24/97 | 25.65 | HORWITH TRUCKS, INC |
| <u> </u> | B 8660322 | 97253 | CWM | 03/24/97 | 25.06 | HORWITH TRUCKS, INC |
| | B 8660313 | 97254 | CWM | 03/24/97 | 23.99 | BUFFALO FUEL CORP. |
| | B 8660304 | 97255 | CWM | 03/24/97 | 21.60 | BUFFALO FUEL CORP. |
| | B 8660295 | | CWM | 03/24/97 | 23.09 | BUFFALO FUEL CORP. |
| | B 8660277 | | CWM | 03/24/97 | 21.45 | BUFFALO FUEL CORP. |
| | B 8660286 | 97258 | CWM | 03/24/97 | 21.42 | BUFFALO FUEL CORP. |
| | B 8660421 | 97249 | CWM | 03/25/97 | 23.36 | RANK'S VACUUM TRUCK SER |
| | B 8660448 | | CWM | 03/25/97 | 23.93 | RANK'S VACUUM TRUCK SER |
| | B 8660241 | 97259 | CWM | 03/25/97 | 26.17 | |
| _ | B 8660232 | 97260 | CWM | 03/25/97 | 25.66 | HORWITH TRUCKS, INC |
| | B 8660223 | 97261 | CWM | 03/25/97 | 23.42 | HORWITH TRUCKS, INC |
| NY | B 8660214 | 97262 * | CWM | 03/25/97 | 26.65 | HORWITH TRUCKS, INC |

| | TABLE 1. H | AZARDOU | - OFF SIT | E SHIPMENTS | |
|----------------------------|----------------|----------|-----------|----------------|---|
| | | | | | |
| STATE | GENERATOR | | | WASTE | |
| MANIFEST | MANIFEST | FACILITY | SHIPPED | SHIPPED | TRANSPORTER |
| DOCUMENT # | | COMPANY | DATE | IN TONS | TRANSPORTER |
| NYB 8660205 | 97263 | CWM | 03/25/97 | 25.10 | HORWITH TRUCKS, INC |
| NYB 8660196 | 97264 | CWM | 03/25/97 | 22.14 | HORWITH TRUCKS, INC |
| NYB 8660178 | 97265 | CWM | 03/25/97 | 21.43 | HORWITH TRUCKS, INC |
| NYB 8660187 | 97266 | CWM | 03/25/97 | 22.80 | HORWITH TRUCKS, INC HORWITH TRUCKS, INC |
| NYB 8660169 | 97267 | CWM | 03/25/97 | 22.11 | HORWITH TRUCKS, INC |
| NYB 8660151 | 97268 | CWM | 03/25/97 | 23.73 | HORWITH TRUCKS, INC |
| NYB 8183772 | 97272 | CWM | 03/25/97 | 24.16 | HORWITH TRUCKS, INC |
| NYB 8183781 | 97273 | CWM | 03/25/97 | 24.24 | HORWITH TRUCKS, INC |
| NYB 8183799 | 97274 | CWM | 03/25/97 | 21.85 | BUFFALO FUEL CORP. |
| NYB 8183808 | 97275 | CWM | 03/25/97 | 24.39 22.79 | BUFFALO FUEL CORP. |
| NYB 8183817 | 97276 | CWM | 03/25/97 | 22.79 | BUFFALO FUEL CORP. |
| NYB 8660142 | 97269 | CWM | 03/26/97 | 23.63 | BUFFALO FUEL CORP. |
| NYB 8660133 | 97270 | CWM | 03/26/97 | 23.63 | BUFFALO FUEL CORP. |
| NYB 8660124 | 97271 | CWM | 03/26/97 | 24.68 | HORWITH TRUCKS, INC |
| NYB 8183763 | 97277 | CWM | 03/26/97 | 23.40 | HORWITH TRUCKS, INC |
| NYB 8660259 | 97278 | CWM | 03/26/97 | 23.83 | HORWITH TRUCKS, INC |
| NYB 8660484 | 97279 | CWM | 03/26/97 | 24.30 | HORWITH TRUCKS, INC |
| NYB 8660493 | 97280 | CWM | 03/26/97 | 24.46 | HORWITH TRUCKS, INC |
| NYB 8660502 | 97281 * | CWM | 03/26/97 | 21.70 | HORWITH TRUCKS, INC |
| NYB 8660106 | 97282 97283 | CWM | 03/26/97 | 22.27 | HORWITH TRUCKS, INC |
| NYB 8660115 PAE 7249491 | 97284 | Envirite | 7/31/97 | 21.31 | FREEHOLD CARTAGE, INC. |
| PAE 7249491 | 97285 | Envirite | 7/31/97 | 23.89 | FREEHOLD CARTAGE, INC. |
| PAE 7249476 | 97286 | Envirite | 8/1/97 | 24.30 | FREEHOLD CARTAGE, INC. |
| PAE 7249406 | 97287 | Envirite | 8/1/97 | 24.39 | FREEHOLD CARTAGE, INC. |
| PAE 4964002 | | Envirite | 8/1/97 | 23.56 | FREEHOLD CARTAGE, INC. |
| PAE 7249465 | | Envirite | 8/4/97 | 23.92 | FREEHOLD CARTAGE, INC. |
| PAE 6745583 | 97290 | Envirite | 8/4/97 | 23.44 | FREEHOLD CARTAGE, INC. |
| PAE 7236854 | 97291 | Envirite | 8/4/97 | 22.34 | FREEHOLD CARTAGE, INC. |
| PAE 7249502 | 97292 | Envirite | 8/4/97 | 24.05 | FREEHOLD CARTAGE, INC. |
| PAE 4963884 | 97293 | Envirite | 8/4/97 | 23.03 | FREEHOLD CARTAGE, INC. |
| PAE 4963895 | | Envirite | 8/5/97 | 23.43 | FREEHOLD CARTAGE, INC. |
| PAE 4963906 | 97295 | Envirite | 8/5/97 | 24.36 | FREEHOLD CARTAGE, INC. |
| PAE 4963910 | 97296 | Envirite | 8/5/97 | 23.99 | FREEHOLD CARTAGE, INC. |
| PAE 4963921 | 97297 | Envirite | 8/5/97 | 24.06 | FREEHOLD CARTAGE, INC. |
| PAE 4963932 | 97298 | Envirite | 8/5/97 | 22.37 | FREEHOLD CARTAGE, INC. |
| PAE 4963943 | 97299 | Envirite | 8/12/97 | 24.48 | FREEHOLD CARTAGE, INC. |
| PAE 4963954 | 97300 | Envirite | 8/12/97 | 24.77 | FREEHOLD CARTAGE, INC. |
| PAE 4963965 | 97301 | Envirite | 8/12/97 | 23.20 | FREEHOLD CARTAGE, INC. |
| PAE 7230263 | 97302 | Envirite | 8/13/97 | 24.09 | FREEHOLD CARTAGE, INC. |
| PAE 7230274 | 97303 | Envirite | 8/13/97 | 23.26 | FREEHOLD CARTAGE, INC. |

| TABLE 1. HAZARDOUS WASTE - OFF SITE SHIPMENTS | | | | | | | | |
|---|-------------|-----------|----------|---------|---------|------------------------|--|--|
| | | | | | | | | |
| | STATE | GENERATOR | | 2111222 | WASTE | | | |
| 7 | MANIFEST | MANIFEST | FACILITY | SHIPPED | SHIPPED | TRANSPORTER | | |
| | OCUMENT # | | COMPANY | DATE | IN TONS | FREEHOLD CARTAGE, INC. | | |
| | PAE 7230285 | 97304 | Envirite | 8/13/97 | 23.52 | | | |
| | PAE 7230296 | 97305 | Envirite | 8/21/97 | 24.55 | FREEHOLD CARTAGE, INC. | | |
| _ | PAE 7230300 | 97306 | Envirite | 8/21/97 | 23.24 | FREEHOLD CARTAGE, INC. | | |
| _ | PAE 7230311 | 97307 | Envirite | 8/21/97 | 22.13 | FREEHOLD CARTAGE, INC. | | |
| _ | PAE 7230322 | 97308 | Envirite | 8/22/97 | 23.41 | FREEHOLD CARTAGE, INC. | | |
| _ | PAE 7230333 | 97309 | Envirite | 8/22/97 | 24.67 | FREEHOLD CARTAGE, INC. | | |
| | PAE 7230344 | 97310 | Envirite | 8/29/97 | 23.12 | FREEHOLD CARTAGE, INC. | | |
| | PAE 7230355 | 97311 | Envirite | 8/29/97 | 24.83 | FREEHOLD CARTAGE, INC. | | |
| | PAE 7230366 | 97312 | Envirite | 8/29/97 | 24.09 | JOHN PFROMMER, INC. | | |
| | PAE 7230370 | 97313 | Envirite | 8/29/97 | 23.62 | JOHN PFROMMER, INC. | | |
| | PAE 7230381 | 97314 | Envirite | 8/29/97 | 24.18 | JOHN PFROMMER, INC. | | |
| | PAE 7230392 | 97315 | Envirite | 9/2/97 | 25.63 | FREEHOLD CARTAGE, INC. | | |
| | PAE 7230403 | 97316 | Envirite | 9/2/97 | 24.89 | FREEHOLD CARTAGE, INC. | | |
| | PAE 7230414 | 97317 | Envirite | 9/2/97 | 24.41 | JOHN PFROMMER, INC. | | |
| | PAE 7230425 | 97318 | Envirite | 9/2/97 | 24.02 | JOHN PFROMMER, INC. | | |
| | PAE 7230436 | 97319 | Envirite | 9/2/97 | 23.70 | JOHN PFROMMER, INC. | | |
| I | PAE 7230440 | 97320 | Envirite | 9/8/97 | 23.12 | JOHN PFROMMER, INC. | | |
| T | PAE 7230451 | 97321 | Envirite | 9/8/97 | 23.93 | JOHN PFROMMER, INC. | | |
| Ţ | PAE 7230462 | 97322 | Envirite | 9/8/97 | 24.77 | JOHN PFROMMER, INC. | | |
| | PAE 7230473 | 97323 | Envirite | 9/8/97 | 23.54 | FREEHOLD CARTAGE, INC. | | |
| ī | PAE 7230484 | 97324 | Envirite | 9/8/97 | 21.77 | FREEHOLD CARTAGE, INC. | | |
| T | PAE 8291452 | 97325 | Envirite | 9/11/97 | 23.69 | FREEHOLD CARTAGE, INC. | | |
| П | PAE 8291463 | 97326 | Envirite | 9/11/97 | 24.00 | FREEHOLD CARTAGE, INC. | | |
| П | PAE 8291474 | 97327 | Envirite | 9/12/97 | 23.48 | JOHN PFROMMER, INC. | | |
| П | PAE 8291485 | 97328 | Envirite | 9/12/97 | 22.41 | JOHN PFROMMER, INC. | | |
| П | PAE 8291496 | 97329 | Envirite | 9/12/97 | 25.76 | JOHN PFROMMER, INC. | | |
| П | PAE 8291500 | 97330 | Envirite | 9/19/97 | 23.93 | FREEHOLD CARTAGE, INC. | | |
| T | PAE 8291511 | 97331 | Envirite | 9/19/97 | 21.87 | FREEHOLD CARTAGE, INC. | | |
| П | PAE 8291533 | 97332 | Envirite | 9/19/97 | 23.30 | JOHN PFROMMER, INC. | | |
| T | PAE 8291544 | 97333 | Envirite | 9/19/97 | 23.71 | JOHN PFROMMER, INC. | | |
| | PAE 8291555 | 97334 | Envirite | 9/19/97 | 22.88 | JOHN PFROMMER, INC. | | |
| _ | PAE 8291566 | 97335 | Envirite | 9/22/97 | 23.90 | JOHN PFROMMER, INC. | | |
| Π | PAE 8291570 | 97336 | Envirite | 9/22/97 | 21.89 | JOHN PFROMMER, INC. | | |
| | PAE8291592 | 98003 | Envirite | 3/5/98 | 24.13 | FREEHOLD CARTAGE, INC. | | |
| _ | PAE8291603 | 98004 | Envirite | 3/6/98 | 23.01 | FREEHOLD CARTAGE, INC. | | |
| | PAE8291625 | 98005 | Envirite | 3/9/98 | 22.55 | FREEHOLD CARTAGE, INC. | | |
| | PAE8291636 | 98006 | Envirite | 3/11/98 | 24.12 | FREEHOLD CARTAGE, INC. | | |
| _ | PAE8291640 | 98008 | Envirite | 3/12/98 | 22.17 | FREEHOLD CARTAGE, INC. | | |
| <u> </u> | PAE8291651 | 98009 | Envirite | 3/13/98 | 23.01 | FREEHOLD CARTAGE, INC. | | |
| | PAE8291662 | 98010 | Envirite | 3/13/98 | 22.23 | FREEHOLD CARTAGE, INC. | | |
| _ | PAE8291673 | 98011 | Envirite | 3/16/98 | 22.29 | FREEHOLD CARTAGE, INC. | | |

| | TARIE 1 HA | ZARDOUS | WASTE | - OFF SIT | E SHIPMENTS |
|--|------------|-------------|--------------|-----------|-----------------------------|
| | IADEL II | <u> </u> | 107.001.2 | <u> </u> | |
| CTATE | GENERATOR | TSD | | WASTE | |
| STATE MANIFEST | MANIFEST | FACILITY | SHIPPED | SHIPPED | |
| DOCUMENT # | | COMPANY | DATE | IN TONS | TRANSPORTER |
| | 98012 | Envirite | 3/16/98 | 23.75 | FREEHOLD CARTAGE, INC. |
| PAE8291684 | 98012 | Envirite | 3/17/98 | 25.83 | FREEHOLD CARTAGE, INC. |
| PAE8291695 PAE8291706 | 98014 | Envirite | 3/17/98 | 22.60 | FREEHOLD CARTAGE, INC. |
| PAE8291415 | 98015 | Envirite | 3/18/98 | 23.20 | FREEHOLD CARTAGE, INC. |
| PAE8291413 | 98016 | Envirite | 3/18/98 | 22.25 | FREEHOLD CARTAGE, INC. |
| PAE8294554 | 98017 | Envirite | 03/19/98 | 22.58 | FREEHOLD CARTAGE, INC. |
| PAE8294543 | 98018 | Envirite | 03/19/98 | 22.34 | FREEHOLD CARTAGE, INC. |
| PAE8294565 | 98019 | Envirite | 3/20/98 | 23.75 | FREEHOLD CARTAGE, INC. |
| PAE8294580 | 98020 | Envirite | 3/20/98 | 23.37 | FREEHOLD CARTAGE, INC. |
| PAE8899376 | 98021 | Envirite | 3/23/98 | 23.63 | FREEHOLD CARTAGE, INC. |
| PAE8899380 | 98022 | Envirite | 3/23/98 | 22.71 | FREEHOLD CARTAGE, INC. |
| PAE8899391 | 98023 | Envirite | 3/24/98 | 25.42 | FREEHOLD CARTAGE, INC. |
| PAE8899402 | 98024 | Envirite | 3/24/98 | 21.92 | FREEHOLD CARTAGE, INC. |
| PAE8899413 | 98025 | Envirite | 3/25/98 | 23.77 | FREEHOLD CARTAGE, INC. |
| PAE8899424 | 98026 | Envirite | 3/25/98 | 22.01 | FREEHOLD CARTAGE, INC. |
| PAE8899435 | 98027 | Envirite | 3/26/98 | 25.05 | FREEHOLD CARTAGE, INC. |
| PAE8899446 | 98028 | Envirite | 3/26/98 | 23.37 | FREEHOLD CARTAGE, INC. |
| PAE8899450 | 98029 | Envirite | 3/27/98 | 23.38 | FREEHOLD CARTAGE, INC. |
| PAE8899461 | 98030 | Envirite | 3/27/98 | 23.34 | FREEHOLD CARTAGE, INC. |
| PAE8899472 | 98031 | Envirite | 3/30/98 | 24.29 | FREEHOLD CARTAGE, INC. |
| PAE8899483 | 98032 | Envirite | 3/30/98 | 21.96 | FREEHOLD CARTAGE, INC. |
| PAE8899494 | 98033 | Envirite | 3/30/98 | 21.95 | FREEHOLD CARTAGE, INC. |
| PAE8899505 | 98034 | Envirite | 3/30/98 | 22.83 | FREEHOLD CARTAGE, INC. |
| PAE8899516 | 98035 | Envirite | 3/30/98 | 22.62 | FREEHOLD CARTAGE, INC. |
| PAE8899520 | 98036 | Envirite | 3/31/98 | 23.33 | FREEHOLD CARTAGE, INC. |
| PAE8899531 | 98037 | Envirite | 3/31/98 | 24.64 | FREEHOLD CARTAGE, INC. |
| PAE8899542 | 98038 | Envirite | 3/31/98 | 22.21 | FREEHOLD CARTAGE, INC. |
| PAE8899553 | 98039 | Envirite | 3/31/98 | 23.21 | FREEHOLD CARTAGE, INC. |
| PAE8899564 | 98040 | Envirite | 3/31/98 | 22.78 | FREEHOLD CARTAGE, INC. |
| PAE8899575 | 98041 | Envirite | 4/1/98 | 24.11 | FREEHOLD CARTAGE, INC. |
| PAE8899586 | 98042 | Envirite | 4/1/98 | 23.60 | FREEHOLD CARTAGE, INC. |
| | | | | | |
| | Total tons | | | | |
| ······································ | shipped | | | 8,577 | |
| | Silibhen | | | | |
| | | BEATTE | IAI OIIIF | MACAITO | E001 |
| | ASPHALTIC | MAILR | IAL SHIP | INIEN 12 | - FUU I |
| | | | | | |
| STATE | GENERATOR | TSD | | WASTE | |
| MANIFEST | MANIFEST | FACILITY | SHIPPED | | |
| DOCUMENT # | DOCUMENT # | COMPANY | DATE | IN TONS | |
| NJA2727361 | 27361 | Clean | 02/18/98 | 0.10 | Clean Harbors Environmental |
| | | Harbors En | vironmenta | | |
| MDC0797087 | 98253 | Safety Klee | | | Safety Kleen (TS), Inc. |

TABLE 2: RECYCLED

TABLE 2 - RECYCLED MATERIAL - SHIPPED OFF SITE

| Company | Recycled Material | Date Shipped | No. of Loads | Total Cu. Yds. |
|--------------|-------------------|--------------|--------------|----------------|
| J.N.Mannis | concrete | 03/25/97 | 18 | 90 |
| J.N. Mannis | concrete | 03/26/97 | 18 | 90 |
| B.J. Recycle | wood | 01/22/97 | 1 | 5 |
| B.J. Recycle | concrete | 01/22/97 | - 1 | 5 |
| B.J. Recycle | concrete | 01/29/97 | 1 | 5 |
| B.J. Recycle | stumps | 01/29/97 | 1 | 6 |
| B.J. Recycle | stumps | 02/03/97 | 1 | 5 |
| B.J. Recycle | concrete | 02/03/97 | 1 | 5 |
| B.J. Recycle | concrete | 02/11/97 | 6 | 30 |
| B.J. Recycle | concrete | 02/14/97 | 2 | 10 |
| B.J. Recycle | concrete | 02/17/97 | 1 | 5 |
| B.J. Recycle | concrete | 02/18/97 | 1 | 5 |
| B.J. Recycle | mixed | 09/11/97 | 6 | 30 |
| B.J. Recycle | mixed | 09/12/97 | 3 | 15 |
| B.J. Recycle | mixed | 09/15/97 | 3 | 15 |
| B.J. Recycle | mixed | 09/16/97 | 1 | 5 |
| B.J. Recycle | mixed | 09/17/97 | 4 | 20 |
| B.J. Recycle | mixed | 09/19/97 | 1 | 5 |
| B.J. Recycle | mixed | 11/07/97 | 2 | 10 |
| B.J. Recycle | stumps | 11/07/97 | 1 | 5 |
| B.J. Recycle | stumps | 01/16/98 | 2 | 10 |
| <u></u> | | TOTALS | 75 | 376 |

TABLE 3: TEST RESULTS

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| Table | 3 - Post | Excav | ation So | I Results | <u>S</u> |
|--------------|------------|-------------------|----------|-----------|------------|
| GRID SAMPL | | | AcuTest | In-house | Value used |
| | AccuTest | | Result | Result | to Average |
| Sample Point | Job Number | Grid Point | mg/Kg | mg/Kg | mg/Kg |
| 1 | E24454-1 | X8 | <10 | <10 | 5 |
| 2 | | A8 | | 13 | 13 |
| 3 | E24454-2 | B8 | 16 | 15 | 16 |
| 4 | E24454-3 | D7 | 15 | 16 | 15 |
| 5 | | C7 | | <10 | 3 |
| 6 | | B7 | | <10 | 3 |
| 7 | | A7 | | <10 | 3 |
| 8 | E24454-7 | X7 | <10 | <10 | 5 |
| 9 | E24454-7 | X6 | 47 | 44 | 47 |
| 10 | E39051-6 | A6 | 18 | <10 | 18 |
| 11 | E35296-2 | B6 | 15 | 106 | 15 |
| 12 | E35296-1 | C6 | 18 | <10 | 18 |
| 13 | E24454-7 | D6 | 20 | 17 | 20 |
| 14 | | C5 | | <10 | 5 |
| 15 | | B5 | | <10 | 5 |
| 16 | E39051-5 | A5 | 69 | <10 | 69 |
| 17 | E24454-7 | X5 | 255 | 263 | 255 |
| 18 | E24454-8 | X4 | 102 | 103 | 102 |
| 19 | E39051-4/E | A4 | 25 | <10 | 25 |
| 20 | | AB4 | 306 | 50 | 306 |
| 21 | E27352-1 | B4 | <11 | 107 | 6 |
| 22 | E27352-2 | BC4 | 87 | 11 | 87 |
| 23 | E24454-9 | C4 | <10 | <10 | 5 |
| 24 | E24454-10 | C3 | 10 | 11 | 10 |
| 25 | E27352-3 | BC3 | 38 | 38 | 38 |
| 26 | E27352-4 | В3 | 241 | 174 | 241 |
| 27 | E27352-5 | AB3 | 79 | 41 | 79 |
| 28 | E39051-3 | A3 | 24 | <10 | 24 |
| 29 | E24454-11 | Х3 | <10 | <10 | 5 |
| 30 | E24454-12 | X2 | 145 | 143 | 145 |
| 31 | E39051-2 | A2 | <11 | <10 | 6 |
| 32 | | AB2 | | | |
| 33 | E27352-6 | B2 | 291 | 106 | 291 |
| 34 | E24454-13 | BC2 | <11 | <10 | 6 |
| 35 | E24454-14 | C2 | <10 | <10 | 5 |
| 36 | | B1 | | <10 | 5 |
| 37 | | AB1 | | <10 | 5 |
| 38 | E39051-1 | A1 | <10 | <10 | 5 |
| 39 | | X1 | | <10 | 5 |
| 40 | E23703-1 | P1 | 41 | | 41 |
| 41 | E23703-2 | P2 | <11 | | 6 |
| 42 | E23703-3 | P3 | <12 | | 6 |
| 43 | | P4 | | | |
| | | | | | mg/Kg |
| | : | | | Average | 10 |
| | | | | Maximum | 306 |
| | | | | Count | 41 |

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TABLE 4 & 5: FINAL RESULTS

| TABLE 4 - Certified Laboratory Results | | | | | | | |
|--|----------------|-------------------|-------------|-----------|------------------|--|--|
| | mg/Kg (ppm) | | | | | | |
| Sample | AccuTest | Accutest In-house | | Date | Source Pile | | |
| number | Sample # | Results | Field Test | Collected | Number | | |
| 121BLD1117 | | 204 | 322 | 11/17/97 | Pile Sample | | |
| 122BLD1117 | | 198 | | 11/17/97 | Pile 23 | | |
| 123AGRD111 | 8 | 306 | | 11/18/97 | Point AB4 | | |
| 124AGRD111 | | 31 | | 11/18/97 | Point B4 | | |
| 125AGRD111 | | 95.7 | | 11/18/97 | Point BC4 | | |
| 128BLD1118 | | 368 | | 11/18/97 | Pile 29b | | |
| 129BLD1119 | | 226 | 209 | 11/19/97 | Pile 30b-1 | | |
| 130AGRD112 | 0 | 79.6 | 70 | 11/20/97 | Point AB3 | | |
| 131AGRD112 | | 241 | 393 | 11/20/97 | Point B3 | | |
| 132AGRD112 | | 297 | · | 11/20/97 | Point BC3 | | |
| 133BLD1124 | | 460 | 404 | 11/24/97 | Pile 35b | | |
| 144BLD121 | | 377 | 335 | 12/01/97 | Pile 40b-1 | | |
| 146BLD123 | | 230 | 209 | | Pile40b-2 | | |
| 147BLD124 | | 419/ | 285 | 12/04/97 | Pile Sample | | |
| 148BLD125 | | 126 | 240 | | Pile 39b | | |
| 149BLD126 | | 363 | 345 | 12/06/97 | Pile36b-2 | | |
| 150BLD126 | | 160 | 127 | 12/06/97 | Pile 43b | | |
| 151RAW129 | - - | 51.4 | 63 | 12/09/97 | Pile 44 | | |
| 152BLD1211 | | 330 | 271 | 12/11/97 | Pile36b-1 | | |
| 153BLD1216 | | 293 | 337 | 12/16/97 | Pile 38b | | |
| 155AGRD121 | L 6 | 325 | 560 | 12/16/97 | Point AB2A | | |
| 156AGRD121 | | 548 | 427 | 12/16/97 | Point AB2B | | |
| 157AGRD121 | | 53.1 | 39 | 12/16/97 | Point B2 | | |
| 158-162GRD1 | | 80.8 | 60 | 12/17/97 | Sump 2 area | | |
| 163GRD1217 | | 429 | 447 | 12/17/97 | Sump 2 area | | |
| 164GRD1218 | | 273 | 366 | 12/18/97 | Sump 1 area | | |
| 165BLD1219 | | 136 | 110 | 12/19/97 | Pile 35b | | |
| 166BLD1224 | | 316 | 260 | 12/24/97 | Pile 6b-1 | | |
| 167BLD1231 | - | 222 | 286 | 12/31/97 | Pile 6b-2 | | |
| 168BLD16 | | 252 | 228 | 01/06/98 | Pile 6b-3 | | |
| | - | 269 | 287 | 01/09/98 | Pile 30b-2 | | |
| 175BLD19 | | 470 | 383 | 01/09/98 | Pile 30b-2 | | |
| 176BLD19 | | 40.7 | 18 | 01/12/98 | Pipeline area | | |
| 177RAW112 | | 259 | 686/462/229 | | Pile 30b-4 | | |
| 180BLD115 | <u> </u> | | 221 | 01/16/98 | Pile 30b-4/30b-3 | | |
| 181BLD116 | | 217 | 147 | 01/19/98 | Sump area rear | | |
| 182RAW119 | | 168 | | 01/19/98 | Pile 45b-1 | | |
| 184BLD120 | | 547 | 613/401 | 01/20/98 | Pile 45b-1 | | |
| 185BLD120 | | 429 | 415 | 01/20/98 | Pile 45b-2 | | |
| 186BLD121 | | 569 | 314 | 01/21/98 | Pile 30b-2 | | |
| 188BLD122 | | 400 | 323 | 01/27/98 | Pile 46b-1 | | |
| 189BLD127 | <u> </u> | 165 | 210 | | | | |
| 190,191,193B | LD | 302 | 272 | | Pile 46b-1 (com | | |
| 196BLD130 | | 223 | 217 | 01/30/98 | Pile Sample | | |
| 197RAW130 | | 362 | 379 | 01/30/98 | Pile Sample | | |
| 199BLD23 | - | 452 | 334 | 02/03/98 | Pile Sample | | |

| mg/Kg (ppm) | | | | | |
|---|----------|--|--|--|--|
| mg/Kg (ppm) | | | | | |
| Sample AccuTest Accutest In-house Date Source | | | | | |
| number Sample # Results Field Test Collected Numb | | | | | |
| 201BLD24 337 387 02/04/98 Pile 45b-2 | | | | | |
| 203BLD26 290 243 02/06/98 Pile 53&50 | | | | | |
| 204BLD26 231 259 02/06/98 Pile 45b-1 | | | | | |
| 205BLD210 336 395 02/10/98 Pile 30b-2 | | | | | |
| 206BLD211 358 360 02/11/98 Pile 30b-2 | | | | | |
| 207BLD211 335 386 02/11/98 Pile 30b-2 | | | | | |
| 208BLD212 239 226 02/12/98 Pile 30b-2 | | | | | |
| 209BLD212 241 226 02/12/98 Pile 30b-2 | | | | | |
| 211RAW216 168 134 02/16/98 Subroad (| | | | | |
| 214BLD223 338 324 02/23/98 Pile 55b-1 | | | | | |
| 215RAW32 138 109 03/02/98 N/W cmr o | | | | | |
| 217BLD32 402 379 03/02/98 Pile 55b-2 | | | | | |
| 220BLD311 161 169 03/11/98 Pile 55b-2 | | | | | |
| 221BLD311 376 275 03/11/98 Pile 55b-2 | . | | | | |
| 224BLD312 365 348 03/12/98 Pile 54b | | | | | |
| 226BLD313 438 327 03/13/98 pile 56b-1 | | | | | |
| 235BLD317 310 320 03/17/98 Pile 56b-2 | | | | | |
| 237BLD326 315 271 03/26/98 Piles 55b- | | | | | |
| 238BLD326 431 372 03/26/98 Piles 55b- | | | | | |
| 242BLD328 365 329 03/28/98 Pile 55b-6 | | | | | |
| 243BLD328 278 301 03/28/98 Pile 55b-5 | | | | | |
| 244BLD328 259 279 03/28/98 Pile 55b-8 | | | | | |
| 245BLD330 344 338 03/30/98 Pile 55b-5 | | | | | |
| 246BLD330 350 314 03/30/98 Pile 55b-9 | | | | | |
| 248BLD331 306 268 03/31/98 Pile 55b-1 | | | | | |
| 249BLD331 272 222 03/31/98 Pile 55b-1 | | | | | |
| 250BLD41 238 195 04/01/98 Pile 55b-1 | | | | | |
| 251BLD41 272 256 04/01/98 Pile 55b-7 | | | | | |
| 252BLD42 225 265 04/02/98 Pile 55b-7 | | | | | |
| 254BLD43 325 245 04/03/98 Pile 55b-1 | | | | | |
| 255BLD43 360 384 04/03/98 Pile 55b-1 | | | | | |
| 256BLD46 256 225 04/06/98 Pile 55b-1 | | | | | |
| 258BLD47 886 325 04/07/98 Pile 58b-3 | | | | | |
| 260BLD47 313 309 04/07/98 Pile 58b-1 | | | | | |
| 261BLD48 308 363 04/08/98 Pile 58b-2 | | | | | |
| 262BLD48 468 440 04/08/98 Pile 58b-4 | | | | | |
| 264BLD413 336 311 04/13/98 Pile 58b-3 | | | | | |
| 265BLD413 335 303 04/13/98 Pile 58b-4 | | | | | |
| 266BLD413 182 208 04/13/98 Pile 55b-4 | | | | | |
| 267BLD414 202 203 04/14/98 Area 6 de | | | | | |
| 268BLD415 168 259 04/15/98 Pile 51b- | | | | | |
| 269BLD416 164 220 04/16/98 Pile 51b- | | | | | |
| 271BLD420 276 236 04/20/98 Pile 51b-3 | 3 | | | | |

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| | TABLE 4 - Certified Laboratory Results | | | | | |
|-----------|--|----------|--|----------------|--------------------|--|
| | mg/Kg (ppm) | | | | | |
| Sample | AccuTest | Accutest | In-house | Date | Source Pile | |
| number | Sample # | Results | Field Test | Collected | Number | |
| 272BLD421 | | 408 | 373 | 04/21/98 | Pile 51b-4 | |
| 276BLD429 | | 298 | 321 | 04/29/98 | Pile 51b-4 resa | |
| GRID C-6 | E35296-1 | 18 | | | GRID SAMPLE | |
| GRID B-6 | E35296-2 | 15 | | | GRID SAMPLE | |
| GRID A-4 | E35296-3 | 14 | <u>· ·</u> | | GRID SAMPLE | |
| 278GRD617 | E35964-1 | 358 | 260 | 06/17/98 | GRID SAMPLE | |
| PILE 76 | E36677-1 | 272 | 235 | 07/06/98 | PILE SAMPLE | |
| 282SRC76 | E36677-2 | 422 | 317 | 07/06/98 | PILE SAMPLE | |
| 283SRC76 | E36677-3 | 446 | 363 | 07/06/98 | PILE SAMPLE | |
| 285BLD710 | E36884-1 | 322 | | 07/09/98 | PILE SAMPLE | |
| 286BLD79 | E36799-1 | 236 | | | PILE SAMPLE | |
| 288REW714 | E37046-1 | 361 | 328 | | PILE SAMPLE | |
| 289REW714 | E37046-2 | 159 | | | PILE SAMPLE | |
| 290BLD715 | E37046-3 | 165 | | 07/16/98 | PILE SAMPLE | |
| 291BLD715 | E37046-4 | 291 | | 07/16/98 | PILE SAMPLE | |
| 293BLD716 | E37046-5 | 151 | 119 | | PILE SAMPLE | |
| 297BLD720 | E37156-1 | 156 | | | PILE SAMPLE | |
| 298BLD720 | E37156-2 | 128 | | | PILE SAMPLE | |
| 299BLD721 | E37192-1 | 266 | | | PILE SAMPLE | |
| 300BLD721 | E37192-2 | 299 | ļ | | PILE SAMPLE | |
| 301BLD721 | E37192-3R | 348 | | | PILE SAMPLE | |
| 303CLR722 | E37304-1 | 134 | | | Near side of ber | |
| 304BLD722 | E37304-2 | 328 | | | PILE SAMPLE | |
| 305BLD722 | E37304-3 | 472 | | · | PILE SAMPLE | |
| 306BLD723 | E37395-1 | 296 | | | PILE SAMPLE | |
| 307BLD723 | E37395-2 | 383 | | | PILE SAMPLE | |
| 308BLD724 | E37395-3 | 306 | | | PILE SAMPLE | |
| 309REW727 | E37433-1 | 332 | | | PILE SAMPLE | |
| 310BLD727 | E37433-2 | 292 | · | | - | |
| 311BLD728 | E37433-3 | 242 | | | | |
| 313BLD729 | E37532-1 | 363 | | | | |
| 314BLD729 | E37748-1 | 159 | | | | |
| 314BLD729 | E37748-2 | 238 | | | | |
| 316BLD84 | E37748-3 | 415 | | | | |
| 317BLD85 | E37858-1 | 301 | | | | |
| 318BLD85 | E37858-2 | 519 | | | | |
| 319BLD86 | E37858-3 | 247 | | | | |
| 321BLD87 | E37977-1 | 252 | | | | |
| 321BLD87 | E37977-2/R/2 | | | - | | |
| 325REW88 | E37977-2/102 | 226 | | | | |
| 326BLD810 | E38016-4 | 238 | | | | |
| | E38016-5 | 187 | | | | |
| 328BLD810 | E38016-5 E38016-1 | 147 | | | | |
| 329REW811 | | 222 | | | | |
| 330REW811 | E38016-2 | 164 | | | | |
| 331REW811 | E38016-3 | 102 | 120 | 00/11/90 | 11 1EE 07 11911 EE | |

| TABLE 4 - Certified Laboratory Results | | | | | | |
|---|----------|-------------|------------|-----------------|------------------|--|
| | | mg/Kg (ppm) | | | | |
| Sample | AccuTest | Accutest | In-house | Date | Source Pile | |
| number | Sample # | Results | Field Test | Collected | Number | |
| 333BLD812 | E38181-1 | 176 | 148 | 08/12/98 | PILE SAMPLE | |
| 335BLD813 | E38181-2 | 348 | 308 | 08/13/98 | PILE SAMPLE | |
| 336REW813 | E38181-3 | 332 | 268 | | PILE SAMPLE | |
| 337BLD813 | E38315-1 | 445 | 328 | 08/13/98 | PILE SAMPLE | |
| 338BLD813 | E38315-2 | 208 | 190 | 08/13/98 | PILE SAMPLE | |
| 339REW814 | E38315-3 | 240 | 195 | 08/14/98 | PILE SAMPLE | |
| 350BLD817 | E38315-4 | 321 | 349 | 08/17/98 | Pile 59-2, Appro | |
| 351BLD817 | E38627-6 | 121 | 109 | 08/17/98 | Pile 59-2, Appro | |
| 352BLD818 | E38413-1 | 229 | 189 | 08/18/98 | | |
| 355BLD820 | E38465-1 | 326 | 324 | 08/20/98 | From 354PRB8 | |
| 358REW821 | E38465-2 | 291 | 203 | 08/21/98 | From 337BLD81 | |
| 359REW821 | E38465-3 | 264 | 336 | 08/21/98 | From 357BLD82 | |
| 365REW824 | E38549-1 | 346 | 307 | 08/24/98 | From 356PRB8 | |
| 366REW825 | E38627-1 | 292 | 288 | 08/25/98 | From 356PRB8 | |
| 367REW825 | E38627-2 | 236 | 201 | 08/25/98 | PILE SAMPLE | |
| 368REW825 | E38627-3 | 234 | 205 | 08/25/98 | From 362BLD82 | |
| 369REW825 | E38627-4 | 247 | 224 | 08/25/98 | From 356PRB8 | |
| 370REW825 | E38627-5 | 416 | 312 | 08/25/98 | From 364PRB8 | |
| 371BLD827 | E38723-1 | 384 | 313 | 08/27/98 | PILE SAMPLE | |
| 372BLD827 | E38723-2 | 336 | 342 | 08/27/98 | PILE SAMPLE | |
| 374REW92 | E38924-4 | 380 | 278 | 09/02/98 | From 370REW8 | |
| 378REW94 | E39050-1 | 305 | 290 | 09/04/98 | From 376BLD92 | |
| 379REW94 | E39050-2 | 357 | 243 | 09/04/98 | From 376BLD92 | |
| A1 #1 827 | E39051-1 | <10 | 30 | 08/27/98 | Grid sample fro | |
| A2 #1 827 | E39051-2 | <11 | ND | 08/27/98 | Grid sample fro | |
| A3 #1 827 | E39051-3 | 37.2 | ND | 08/27/98 | Grid sample fro | |
| A4 #1 827 | E39051-4 | 24 | 23 | 08/27/98 | Grid sample fro | |
| A5 #1 827 | E39051-5 | 69 | 80 | 08/27/98 | Grid sample fro | |
| A6 #1 827 | E39051-6 | 17.8 | 16 | 08/27/98 | Grid sample fro | |
| 380REW98 | E39156-1 | 278 | 284 | 09/08/98 | From 375BLD92 | |
| 381REW98 | E39156-2 | 239 | 195 | 09/08/98 | From 375BLD92 | |
| 382REW99 | E39230-1 | 298 | 293 | 09/09/98 | From 377BLD92 | |
| 383REW99 | E39230-2 | 327 | 334 | 09/09/98 | From 377BLD92 | |
| 386BLD915 | E39555-1 | 251 | 314/328 | 09/15/98 | PILE SAMPLE | |
| 387CLR916 | E39555-2 | 17.2 | 19 | 09/16/98 | Soil under Deco | |
| CUMULATIVE STATISTICS # Certified # In-house Avg. Pile Pb level | | | | | | |
| FOR PILES C | NLY | Samples | Samples | Certified (ppm) | | |
| NOT COID DO | | | | | | |
| ואטו שאוט רי | OINTS OR | 136 | 132 | 299 | | |

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| TABLE 5 - SOUTH SITE WATER SAMPLING | | | | | | |
|-------------------------------------|----------------------------------|----------------------------------|-----------------|------|-------|------------|
| | | | | | | 7.01.118.5 |
| SAMPLE NO. | START DATE/TIME | END DATE/TIME | TOTAL LEAD | рΗ | TSS | VOLUME |
| | | | (ppm) | | (ppm) | (GAL) |
| H2O94AB | 9/4/97 10:40 | 9/5/97_07:15 | 0.16 | 6.7 | 80 | 78,440 |
| H2O95A | 9/5/97 9:00 | 9/6/97 11:00 | 0.17 | 6.8 | 108 | 78,840 |
| H2O96A | 9/6/97 11:00 | 9/7/97 10:00 | 0.27 | 6.4 | 120 | 32,720 |
| H2O97A | 9/7/97 10:00 | 9/8/97 11:30 | 0.36 | 6.7 | 136 | 10,600 |
| H2O98A | 9/8/97 14:30 | 9/9/97 8:00 | 0.22 | 7.6 | 244 | 69,400 |
| H2O99A | 9/9/97 8:00 | 9/10/97 7:15 | 0.24 | 6.4 | 236 | 69,200 |
| H2O910A | | 9/11/97 7:15 | 0.29 | 6.4 | 212 | 23,900 |
| H2O911A | 9/11/97 07:15 | 9/12/97 7:45 | 0.32 | 6.6 | 208 | 81,100 |
| H2O912A | 9/12/97 7:45 | 9/13/97 10:00 | 0.43 | 6.4 | 240 | 81,700 |
| H2O913A | 9/13/97 10:00 | 9/14/97 14:30 | 0.45 | 6.5_ | 264 | 23,000 |
| H2O914A | 9/14/97 14:30 | 9/15/97 7:20 | 0.44 | 6.6 | 274 | 47,200 |
| H2O915A | 9/15/97 7:20 | 9/16/97 7:20 | 0.45 | 6.5 | 352 | 78,100 |
| H2O916A | 9/16/97 7:20 | 9/17/97 7:30 | 0.59 | 6.5 | 370 | 45,800 |
| H2O917A | 9/17/97 7:30 | 9/17/97 13:00 | 0.5 | 8.1 | 316 | 50,000 |
| H2O918A | 9/18/97 11:00 | 9/19/97 7:15 | 0.47 | 6.2 | 476 | 50,000 |
| H2O919A | 9/19/97 7:15 | 09/20/97 12:15 | 0.49 | 7.5 | 312 | 48,300 |
| | Note: Daily volumes | for 9/17, 9/18 and 9/1 | 9 are estimated | | SEP. | 868,300 |
| H2O1020A | 10/20/97 10:00 | 10/20/97 13:00 | 0.16 | 5.9 | 260 | 8,000 |
| | 10/20/97 10:00 | 10/21/97 14:00 | 2.59 | 6.6 | 724 | 10,500 |
| H2O1021A | | 10/22/97 11:30 | 2.59 | 7.4 | 834 | 4,300 |
| H2O1022A | 10/22/97 08:00 | | 0.14 | 6.7 | 198 | 4,300 |
| H2O1028A | 10/28/97 13:30 | 10/28/97 13:30 | 0.14 | 6.0 | 269 | 2,800 |
| H2O1030A | 10/30/97 08:00 10/31/97 08:00 | 10/30/97 14:45 10/31/97 14:45 | 0.76 | 5.7 | 237 | 900 |
| H2O1031A | 10/31/97 08.00 | 10/31/9/ 14.45 | 0.76 | 3.7 | OCT. | 26,500 |
| | | | | | | |
| H2O1224A | 12/24/97 09:15 | 12/24/97 11:30 | 0.20 | 9.0 | 596 | 700 |
| | | | | | DEC. | 700 |
| 11004444 | 4/44/09 40:20 | 1/15/09 07:20 | 0.25 | 8.0 | 11 | 49,300 |
| H2O114A | 1/14/98 10:30 | 1/15/98 07:30 1/15/98 12:00 | 0.25 | 8 | 11 | 7,500 |
| H2O115A | 1/15/98 07:30 | 1/15/96 12.00 | 0.22 | 0 | JAN. | 56,800 |
| • | | | | | | • |
| H2O212A | 2/12/98 10:00 | 2/12/98 11:00 | 0.24 | 5.5 | 6 | 2,800 |
| H2O218A | 2/18/98 07:45 | 2/19/98 07:15 | 0.17 | 7.3 | 8 | 18,100 |
| H2O219A | 2/19/98 07:15 | 2/19/98 16:00 | 0.11 | 7.3 | 4 | 14,000 |
| H2O219B | 2/19/98 16:00 | 2/20/98 07:00 | <0.10 | 7.3 | 5 | 14,900 |
| H2O220A | 2/20/98 07:00 | 2/20/98 11:30 | <0.10 | 7.6 | 6 | 4,700 |
| | | | | | FEB. | 54,500 |
| | | | - | | | |
| H2O35A | 3/5/98 14:00 | 3/5/98 16:30 | 0.21 | 7.1 | 15 | 5,900 |
| H2O35B | 3/5/98 16:30 | 3/6/98 07:15 | 0.10 | 7.1 | 5 | 37,600 |
| H2O36A | 3/6/98 07:15 | 3/6/98 18:00 | 0.15 | 7.2 | 21 | 27,100 |
| H2O36B | 3/6/98 18:00 | 3/7/98 06:30 | <0.10 | 7.2 | 3 | 31,300 |
| H2O37A | 3/7/98 06:30 | 3/7/98 15:00 | 0.12 | 7.1 | 3 | 21,100 |
| H2O37B | 3/7/98 15:00 | 3/8/98 14:00 | <0.10 | 7.0 | 3 | 55,300 |
| H2O38A | 3/8/98 14:00 | 3/9/98 07:30 | 0.14 | 6.9 | 28 | 40,800 |
| H2O39A | 3/9/98 07:30 | 3/10/98 07:30 | 0.11 | 6.8 | 20 | 59,000 |
| H2O10A | 3/10/98 07:30 | 3/11/98 07:30 | <0.10 | 7.4 | 11 | 60,700 |

| 7 | TABLE 5 - SOU | TH SITE WAT | ER SAMPI | ING | | |
|------------|-----------------|---------------------------------------|------------|-----|-------|-----------|
| | | · · · · · · · · · · · · · · · · · · · | | | | |
| SAMPLE NO. | START DATE/TIME | END DATE/TIME | TOTAL LEAD | pН | TSS | VOLUME |
| 7 | | | (ppm) | | (ppm) | (GAL) |
| H2O311A | 3/11/98 07:30 | 3/12/98 07:30 | 0.14 | 6.9 | 7 | 60,400 |
| H2O312A | 3/12/98 07:30 | 3/13/98 07:30 | 0.13 | 6.8 | 4 | 60,300 |
| H2O313A | 3/13/98 07:30 | 3/14/98 07:30 | <0.10 | 7.1 | 3 | 59,400 |
| H2O314A | 3/14/98 07:30 | 3/15/98 12:30 | <0.10 | 6.8 | 2 | 72,400 |
| H2O315A | 3/15/98 12:30 | 3/16/98 07:30 | <0.10 | 6.8 | 1 | 45,700 |
| H2O316A | 3/16/98 07:30 | 3/17/98 07:30 | 0.18 | 6.7 | 3 | 58,400 |
| H2O317A | 3/17/98 07:30 | 3/18/98 07:30 | 0.25 | 6.6 | 5 | 57,600 |
| H2O318A | 3/18/98 07:30 | 3/18/98 07:30 | 0.27 | 6.4 | 5 | 55,900 |
| H2O319A | 3/19/98 07:30 | 3/20/98 07:30 | 0.25 | 6.8 | 10 | 36,900 |
| H2O320A | 3/20/98 07:30 | 3/20/98 15:00 | 0.28 | 7.0 | 2 | 7,300 |
| H2O320B | 3/20/98 15:00 | 3/21/98 11:30 | 0.35 | 6.6 | 14 | 53,500 |
| H2O321A | 3/21/98 11:30 | 3/22/98 14:00 | 0.27 | 6.6 | 6 | 68,600 |
| H2O322A | 3/22/98 14:00 | 3/23/98 07:30 | 0.23 | 6.7 | 2 | 44,800 |
| H2O323A | 3/23/98 07:30 | 3/24/98 07:30 | 0.24 | 6.6 | 3 | 61,800 |
| H2O324A | 3/24/98 07:30 | 3/25/98 07:30 | 0.29 | 6.6 | 2 | 61,600 |
| H2O325A | 3/25/98 07:30 | 3/26/98 07:30 | 0.22 | 6.7 | 2 | 61,500 |
| H2O326A | 3/26/98 07:30 | 3/27/98 07:30 | 0.35 | 7.2 | 3 | 60,700 |
| H2O327A | 3/27/98 07:30 | 3/28/98 07:30 | 0.25 | 7 | 2 | 65,000 |
| H2O328A | 3/28/98 07:30 | 3/29/98 11:00 | 0.22 | 6.8 | 1 | 68,200 |
| H2O329A | 3/29/98 11:00 | 3/30/98 07:30 | 0.23 | 7 | 2 | 47,300 |
| H2O330A | 3/30/98 07:30 | 3/31/98 07:30 | 0.22 | 6.9 | 3 | 51,800 |
| H2O331A | 3/31/98 07:30 | 4/1/98 07:30 | 0.29 | 7.3 | 4 | 54,800 |
| | | | | | MAR. | 1,552,700 |
| 1 | | | | | | |
| H2O41A | 4/1/98 07:30 | 4/2/98 07:30 | 0.31 | 7.2 | 4 | 55,800 |
| H2O42A | 4/2/98 07:30 | 4/3/98 07:30 | 0.32 | 7.1 | 1 | 54,400 |
| H2O43A | 4/3/98 07:30 | 4/4/98 12:30 | 0.23 | 6.7 | 2 | 70,900 |
| H2O44A | 4/4/98 12:30 | 4/5/98 12:00 | 0.27 | 7.2 | 2 | 56,000 |
| H2O45A | 4/5/98 12:00 | 4/6/98 07:30 | 0.25 | 6.6 | 1 | 46,600 |
| H2O46A | 4/6/98 07:30 | 4/7/98 07:30 | 0.23 | 6.6 | 14 | 60,000 |
| H2O47A | 4/7/98 07:30 | 4/8/98 07:30 | 0.34 | 6.5 | 6 | 64,500 |
| H2O48A | 4/8/98 07:30 | 4/9/98 07:30 | 0.31 | 6.8 | 4 | 63,800 |
| H2O49A | 4/9/98 07:30 | 4/10/98 07:30 | 0.37 | 6.7 | 8 | 37,000 |
| H2O410A | 4/10/98 07:30 | 4/11/98 07:30 | 0.25 | 6.5 | 3 | 46,700 |
| H2O411A | 4/11/98 07:30 | 4/12/98 12:30 | 0.27 | 6.5 | 3 | 72,800 |
| H2O412A | 4/12/98 12:30 | 4/13/98 07:30 | 0.23 | 6.5 | 6 | 47,600 |
| H2O413A | 4/13/98 07:30 | 4/14/98 07:30 | 0.33 | 6.6 | 1 | 55,600 |
| H2O414A | 4/14/98 07:30 | 4/14/98 17:30 | 0.38 | 6.7 | 21 | 15,500 |
| H2O415A | 4/15/98 09:30 | 4/16/98 07:30 | 0.23 | 6.8 | 4 | 59,400 |
| H2O416A | 4/16/98 07:30 | 4/17/98 07:30 | 0.3 | 6.9 | 9 | 60,000 |
| H2O417A | 4/17/98 07:30 | 4/18/98 07:30 | 0.26 | 6.6 | 5 | 35,300 |
| H2O418A | 4/18/98 07:30 | 4/19/98 11:30 | 0.33 | 6.8 | 2 | 55,600 |
| H2O419A | 4/19/98 11:30 | 4/20/98 07:30 | 0.28 | 6.5 | 2 | 18,300 |
| H2O420A | 4/20/98 20:00 | 4/21/98 07:30 | 0.25 | 6.7 | 6 | 29,000 |
| H2O421A | 4/21/98 07:30 | 4/22/98 07:30 | 0.34 | 6.9 | 8 | 56,100 |
| H2O422A | 4/22/98 07:30 | 4/23/98 07:30 | 0.26 | 6.5 | 8 | 20,600 |
| H2O423A | 4/23/98 07:30 | 4/24/98 07:30 | 0.34 | 6.7 | 15 | 9,800 |
| H2O424A | 4/24/98 07:30 | 4/25/98 07:30 | 0.31 | 6.9 | 7 | 42,100 |
| H2O425A | 4/25/98 07:30 | 4/26/98 16:00 | 0.28 | 6.9 | 2 | 71,700 |
| H2O427A | 4/27/98 07:30 | 4/28/98 07:30 | 0.38 | 6.6 | 2 | 52,000 |

| TABLE 5 - SOUTH SITE WATER SAMPLING | | | | | | |
|-------------------------------------|-----------------|-----------------------|--------------|-----|--|-----------|
| | | - | | | | |
| SAMPLE NO. | START DATE/TIME | END DATE/TIME | TOTAL LEAD | рН | TSS | VOLUME |
| | | | (ppm) | | (ppm) | (GAL) |
| H2O428A | 4/28/98 07:30 | 4/29/98 07:30 | 0.30 | 6.8 | 4 | 38,000 |
| H2O429A | 4/29/98 07:30 | 4/30/98 07:30 | 0.23 | 6.9 | 7 | 24,900 |
| H2O430A | 4/30/98 07:30 | 5/1/98 10:00 | 0.28 | 6.6 | 3 | 27,000 |
| | | | | | APR. | 1,347,000 |
| | | | | | | |
| H2O51A | 5/1/98 10:00 | 5/2/98 07:30 | 0.35 | 6.4 | 1 | 20,900 |
| H2O52A | 5/2/98 07:30 | 5/3/98 11:00 | 0.32 | 6.7 | 2 | 27,900 |
| H2O53A | 5/3/98 11:00 | 5/4/98 07:30 | 0.37 | 6.8 | 1 | 27,100 |
| H2O54A | 5/4/98 07:30 | 5/5/98 07:30 | 0.47 | 6.7 | 4 | 32,600 |
| H2O55A | 5/5/98 07:30 | 5/6/98 07:30 | 0.43 | 6.8 | 3 | 32,500 |
| H2O56A | 5/6/98 07:30 | 5/7/98 07:30 | 0.27 | 7.1 | 1 | 32,300 |
| H2O57A | 5/7/98 07:30 | 5/8/98 07:30 | 0.33 | 6.9 | 3 | 30,400 |
| H2O58A | 5/8/98 07:30 | 5/9/98 16:30 | 0.24 | NA | 4 | 39,300 |
| H2O510A | 5/9/98 16:30 | 5/10/98 13:30 | 0.25 | NA | 31 | 63,100 |
| H2O511A | 5/10/98 13:30 | 5/11/98 09:50 | 0.29 | NA | 19 | 61,700 |
| HO2512A | 5/11/98 09:50 | 5/12/98 22:00 | 0.20 | NA | 5 | 72,800 |
| | | | | | MAY | 440,600 |
| | | | | | | |
| H2O513A | 7/2/98 08:00 | 7/2/98 17:00 | <0.01 | 7.1 | <1 | 1,100 |
| | | | | | JUN | 1,100 |
| | | | | | TOTAL | 4,348,200 |
| KEY: | | | | | IUIAL | 4,340,200 |
| Example: | Sample number | H2O55A | | | ├ | |
| | H2O | Water sample | | | | |
| | 55 | Start Date (May 5) | | | | |
| | Α | First composite (alph | na. order) | | | |
| | | | | | 11 | |

APPENDIX A

PERMITS



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CE Consultants, Inc.

Remedial Action Work Plan

Prepared for:

Lenox. Incorporated

Project No. C0020 October 16, 1996

A Crouse Enterprises Company

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Crouse Enterprises, Inc.

Remedial Action Work Plan

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Remedial Action Work Plan Lenox, Incorporated Pomona, New Jersey

1.0 Introduction

The project site (South Site) is located directly south of the Lenox China (Lenox) facility on Tilton Road in Pomona, Galloway Township, New Jersey. The South Site is not part of the Lenox facility, rather it is an approximate one acre tract of land which is contiguous to the Lenox facility as shown in Figure 1.

The South Site was utilized by Lenox to store waste plaster molds and broken ware from approximately 1954 to the late 1970s. The extent of the South Side, materials stored and the dates of operation were determined by a review of historic aerial photographs and through an interview with a former employee. These photographs and the interview indicate that all waste materials were placed on the surface of the South Site with the only exception being a small pit on the north end of the South Site. It is estimated that this pit was a maximum of six feet deep with an area of less than 0.1 acre.

Recently, Lenox personnel were informed by the property owner that the property which includes the South Site will be developed. The owner is currently seeking approvals for construction of a continuing care retirement facility on this property.

Lenox personnel recently walked the property and small amounts of broken china and plaster molds are visible on the surface. Lenox retained CE Consultants, Inc. (CE Consultants) to perform a remedial soil investigation for the purpose of determining the extent to which site soils had been affected by the china. This investigation is described in Section 2 below.

2.0 Remedial Investigation

2.1 Field Activities

CE Consultants personnel conducted the remedial investigation (RI) on September 10 and 11, 1996, and this RI generally followed the requirements of N.J.A.C. 7:26E-3.6. Soil samples were collected from 13 locations in and around the South Site as shown in

Figure 1. Additionally, the samples were analyzed for zinc because it is also used in the manufacturing process and would be indicative of metallic contamination at the site.

2.1.1 Background Sample Locations

Background Sample Locations SS-1, SS-2, and SS-3 are located within the wooded areas to the west, south, and east of the South Site, respectively. Three separate soil samples (0 to 6 inches, 6 to 12 inches, and 12 to 18 inches) were collected at each location. The 0 to 6 inch and 6 to 12 inch samples were submitted to Accutest Laboratories (Accutest) in Dayton, New Jersey for analysis of total lead and zinc. The 12 to 18 inch samples were archived.

In general, soil at the background locations consisted of gray sand to a depth of approximately 4 to 6 inches followed by brown sand to the bottom of the auger boring. Gravel was present in the sand at some locations. No pieces of china or plaster were observed in any of the background samples which appeared in all respects to be natural soil unaffected by human activity.

2.1.2 Flat Area Sample Locations

Soil samples were collected from 8 locations within the flat area (Flat Area) of the South Site that comprises approximately 90 percent of the total site. Three separate soil samples (0 to 6 inches, 6 to 12 inches, and 12 to 18 inches) were collected at each location. The 0 to 6 inch and 6 to 12 inch samples were submitted to Accutest for analysis of total lead and zinc. The 12 to 18 inch samples were archived.

In general, the ground surface in the Flat Area (at each sampling location) has discrete pieces of china and plaster up to approximately 2 inches in size with most pieces being less than 1 inch. At most of the sampling locations, these pieces of china were limited to the upper 3 to 4 inches of the soil profile which consisted of sand and gravel. Soil samples from the 0 to 6 inch interval were sieved through an approximate 1 millimeter sieve to remove the china pieces from the sample.

Soil samples from the 6 to 12 inch interval consisted of brown sand and gravel. Pieces of china were detected in this interval at only two sample locations (SS-9 and SS-10). At Sample Location SS-9, there were a few pieces of china approximately 1/2-inch in size, which were sieved out of the sample. Similar conditions were present at Sample Location SS-10; however, the soil at Sample Location SS-10 was clayey and could not be sieved.

Hand auguring continued at the Sample Location SS-10 location with samples collected every 6 inches until a china-free interval was reached. This occurred at a depth of 30 to 36 inches. These additional samples were archived.

2.1.3 Pit

A pit (Pit) was identified on the South Site. Hand-auger borings were placed at two sample locations (SS-12 and SS-13) in this area. The Pit area is on the western bank of the existing surface water retention basin. The approximate location of the Pit is shown in Figure 1.

At Sample Location SS-12, china pieces were present in the soil (sand) at a depth of 30 inches. The china pieces were very abundant at 52 inches and auger refusal was encountered in china at a depth of 54 inches. Conditions were similar at soil Sample Location SS-13 with china chips first encountered at a depth of 34 inches, becoming abundant at 50 inches, with auger refusal at 52 inches. Two samples from Sample Location SS-12 (0 to 30 inches and 30 to 54 inches) and two samples from Sample Location SS-13 (0 to 34 inches and 34 to 52 inches) were submitted for laboratory analyses.

2.1.4 Dredge Sample

On September 11, 1996, a contractor for the property owner was using an excavator to muck-out the existing surface water retention basin. Several buckets of the dredged sediment removed from the basin near the Pit contained china pieces. One bucket contained abundant china pieces. A sample of the dredgings was collected and submitted for laboratory analysis.

2.1.5 Quality Assurance Samples

Three duplicate samples, 1 matrix spike sample and 2 sampling equipment rinseate samples (one per day) were collected and submitted for laboratory analyses.

2.1.6 Sampling Equipment Decontamination Procedure

The soil sampling equipment which included a stainless-steel hand auger, a stainless-steel scoop, and a sieve were decontaminated between samples utilizing the following procedures:

- Remove loose soil
- Detergent wash
- Distilled water rinse
- 20 percent nitric acid solution rinse
- Distilled water rinse

2.1.7 Groundwater

Lead, which is the contaminant of concern at the South Site, is bound in a glass matrix (glaze) on the china. In this form, the lead is not easily mobilized and does not impact groundwater based upon numerous previous investigations performed at the Lenox facility. Moreover, Earth Sciences Consultants, Inc. (Earth Sciences) conducted a groundwater investigation downgradient of the South Site. This groundwater investigation included the permitted installation of three monitoring wells constructed to NJDEP standards which were sampled and analyzed for lead and volatile organic compounds (VOCs). No VOCs were detected in any of the samples and lead levels were well below drinking water standards. A copy of the data obtained is included in Attachment A. For these reasons, groundwater was not investigated during the September 1996 RI.

2.2 Discussion of Results

These data are summarized in Table 1. Lead and zinc were either not detected or present at concentrations only slightly above detection limits in samples from the three background sampling locations. Elevated concentrations of lead and zinc were present in soil samples collected from the Flat Area and the Pit. In comparing these data to the State of New Jersey residential cleanup standard of 400 milligrams per kilogram (mg/Kg) for total lead and 1,500 mg/Kg for total zinc, it is apparent that the lead standard is exceeded in the

Pit/Dredge Area and at only a few locations in the Flat Area. The zinc standard was not exceeded at any location.

Specifically, all samples from the Pit [SS-12 (0 to 30 inches), SS-12 (30 to 54 inches), SS-13 (0 to 34 inches), SS-13 (34 to 54 inches) and Pond Dredgings] exceeded the residential lead cleanup standard with lead concentrations ranging from 3,270 to 15,500 mg/k. However, only 6 samples from the Flat Area [SS-4 (0 to 6 inches), SS-6 (0 to 6 inches), SS-9 (0 to 6 inches), SS-10 (0 to 6 inches), SS-10 (6 to 12 inches) and SS-11 (0 to 6 inches)] exceeded the lead cleanup standard. Concentrations in these samples ranged from 1,190 milligrams per liter (mg/l) to 15,500 mg/l. Soil samples collected from below the upper 6-inch interval in the Flat Area did not exceed the lead cleanup standard. The only exception was Soil Sample SS-10 (6 to 12 inches).

Pieces of broken china were observed in the upper 3 or 4 inches of the soil profile in the Flat Area and to a depth of 30 inches at Sample Location SS-10. It should be noted that while all samples which exceeded the cleanup standard contained china chips, not all samples which contained china chips exceeded the standard. In general, it appears that the presence of china pieces can be used as a visual indicator in guiding remedial action at the site.

2.3 Certification

The nature and extent of the South Site and the vertical and horizontal extent of lead in soils has been adequately determined for the purpose of initiating remedial action at this site based on our best professional judgment. A certification statement is attached as Attachment B.

3.0 Remedial Action

3.1 Remedial Action Work Plan(RAW) Requirements

This RAW was prepared in conformance with the requirements of N.J.A.C. 7:26E-6. The horizontal extent of the contaminated area was determined based on visual observations at the site, interviews with knowledgeable plant personnel, review of historical aerial photographs and soil sampling conducted during the RI. The remedial work will be performed in accordance with the requirements of New Jersey Department of Environmental Protection (NJDEP) regulations and using best professional judgment. Following excavation of contaminated soil (estimated at 800 cubic yards), samples will be

collected at the locations shown in Figure 1 to confirm that the area has been adequately remediated. Additionally, groundwater quality will be investigated utilizing geoprobe borings as described in Section 3.5 below.

3.2 Applicable Remediation Standards

Lead is the only constituent of concern in soils at the site. The applicable remediation standards are the NJDEP Direct Contact Soil Cleanup Criteria (SCC) for residential properties. These standards are presented in NJDEP's February 3, 1992 Cleanup Standards for Contaminated Sites (N.J.A.C. 7:26D). Based on these standards, the current SCC for lead at residential properties is 400 mg/Kg.

3.3 Remedial Action Description

Remedial action at the South Site will consist of excavation and off-site disposal of soil/china in the Pit/Dredge Area. The soil/china from the Pit/Dredge Area will be removed utilizing an excavator and/or loader. Excavation will continue until unaffected (nonchinacontaining) soils are encountered. The soil/china will be loaded into lined and covered roll-off containers and stored on Lenox property pending laboratory analysis. Based on the laboratory results, the excavated material will be disposed/recycled at an appropriate off-site facility.

The remaining remedial action at the South Site will consist of removal of the china chips in the upper 6 inches of soil in the Flat Area. The china chips will be removed utilizing screening equipment. The removed china chips will be disposed/recycled at an appropriate off-site facility.

Remedial activities will be verified through the collection and laboratory analysis of confirmation soil samples. The number and location of the confirmation samples will be as shown in Figure 1. If these surfacial samples indicate that lead contamination above the 400 mg/Kg residential cleanup level remains, additional soil will be removed followed by a second round of confirmation sampling.

Soil at the South Site consists primarily of sand having a relatively high permeability and the site is generally flat. Therefore, it is not expected that surface water runoff will pose a problem. In fact, surface water runoff from the area around the South Site is currently directed to a drainage swale on the South Site (Figure 1) where it infiltrates into the

subsurface. Considering these conditions, erosion and sedimentation control for the remedial action will consist of seeding and mulching.

3.4 Confirmatory Soil Sampling

Following excavation of contaminated soil at the South Site, confirmatory soil samples will be collected and analyzed for total lead. These samples will be collected based on a approximate 70-foot by 70-foot square grid as shown in Figure 1. Grid sampling locations will be supplemented by several additional samples placed to ensure adequate delineation of the horizontal limits of the area and/or as necessary based on field observations at the time of remediation.

3.5 Geoprobe Investigation

A geoprobe investigation will be conducted (after confirmation soil sampling proves the site soils are below the cleanup level) to collect groundwater samples for purposes of confirming the previous investigation conducted by Earth Sciences. Groundwater flow at the Lenox facility is toward the northeast. Three geoprobe borings will be drilled hydraulically downgradient of the South Site. The approximate geoprobe drilling locations are shown in Figure 1.

A geoprobe is a hydraulically-powered percussion/probing machine specifically designed for use in the environmental industry. The geoprobe uses direct push technology to insert sampling tools into the ground without the use of a drilling method to remove the soil and make a path for the sampling tool. Direct push technology relies on the static weight of the vehicle upon which the unit is mounted combined with the percussive force of the hydraulic hammer. Groundwater samples are collected by inserting plastic tubing through geoprobe rods and utilizing a peristaltic pump to extract the water sample from the subsurface and place it directly into the sample container.

3.6 Equipment Decontamination

An equipment decontamination area will be set up near the South Site at the approximate location shown in Figure 1. A 50-mil plastic liner will be used to construct a 16-foot by 24-foot decontamination pad for purposes of collecting the decontamination fluids. Loose soil will be removed from the equipment (and ultimately the decontamination area) and disposed with the contaminated soil from the South Site. The equipment will be pressure washed and the washwater will be collected for treatment at Lenox's on-site lead bearing

wastewater treatment plant which discharges to the Atlantic County Utility Authority (ACUA) sanitary system.

All sampling equipment, such as the geoprobe rods, soil trowels, etc., will be decontaminated by the same procedure utilized in the RI which includes:

- Remove loose soil
- Detergent wash
- Distilled water rinse
- 20 percent nitric acid solution rinse
- Distilled water rinse

The decontamination fluids will be collected into 55-gallon drums and transported to the on-site wastewater treatment plant.

3.7 Waste Disposal

Soil removed from the South Site will be placed in lined and tarped roll-off containers having sealed end gates and temporarily stored in one of the parking areas at the Lenox facility pending analysis. The roll-off containers will be sampled and analyzed to determine whether or not the soil is hazardous and the soil will be disposed/recycled at an appropriate off-site disposal/recycling facility. These facilities will include Chemical Waste Management, Chemical Services facilities in Model City, NY or Emille, Alabama (for hazardous waste); the ACUA landfill in Eggharbor Township, New Jersey (for residual waste); or A.E. Stone, Inc., an asphalt plant, located in Egg Harbor Township (if recycling is appropriate).

3.8 Plans

All required plans (Health & Safety, Sampling & Analysis, Quality Assurance/Quality Control) will be based upon those previously submitted and approved by the NJDEP for the Lenox site.

3.9 Project Schedule

Lenox has requested that the NJDEP conduct an expedited review and approval of this RAWP in order that the work may be completed prior to the 1996/1997 Winter season. Assuming that approvals of this RAWP are received by October 30, 1996, Lenox will adhere to the following schedule:

| Item | Elapsed Time from Receipt of NJDEP Approval (Weeks) |
|---|---|
| Contract with Construction and Disposal/Recycle Firms and Notify NJDEP of Starting Date of Field Activities | 3 |
| Start Field Removal | 4 |
| Complete Field Removal and Store Wastes and Notify NJDEP of Starting Date of Geoprobe Activities | 6 |
| Geoprobe Testing | 7 to 9 |
| Receipt Analytical Results | 7 |
| Ship Wastes | 9 |
| Submit Remedial Action Report to NJDEP | . 11 |

Table 1 Soil Sample Data Lenox Incorporated Pomona, New Jersey

| | Sample | | | |
|---------------------------------------|----------------|-----------|---------------|------------|
| | Location | Sample | Total Lead | Total Zinc |
| | Designation | Depth | mg/Kg | mg/Kg |
| | | | | |
| ples | SS-1 | (0-6") | <10 | <2.0 |
| Sam | SS-1 | (6-12") | <10 | 3.3 |
| pur | SS-2 | (0-6") | 12.5 | <2.1 |
| Background Samples | SS-2 | (6-12") | <11 | 6.2 |
| Bacl | SS-3 | (0-6") | 25.4 | 2.2 |
| | SS-3 | (6-12") | <11 | 4.6 |
| · · · · · · · · · · · · · · · · · · · | SS-4 | (0-6") | 2,680/3,580 | 92.2/93.9 |
| | SS-4 | (6-12") | 12.0 | 2.5 |
| | SS-5 | (0-6") | 92.9 | 6.4 |
| | SS-5 | (6-12") | <10 | 2.5 |
| | SS-6 | (0-6") | 7,300 | 136 |
| | SS-6 | (6-12") | 11.0 | 4.2 |
| les | SS-7 | (0-6") | 40.3 | 12.0 |
| amp | SS-7 | (6-12") | <10 | 3.0 |
| å S | SS-8 | (0-6") | 246 | 9.1 |
| Flat Area Samples | SS-8 | (6-12") | <11 | 2.2 |
| 리 리 | SS-9 | (0-6") | 1,190 | 39.2 |
| | SS-9 | (6-12") | 40.8 | 3.7 |
| | SS-10 | (0-6") | 1,860 | 45.2 |
| | SS-10 | (6-12") | 1,850 | 49.4 |
| | SS-11 | (0-6") | 15,500/15,500 | 283/286 |
| | SS-11 | (6-12") | 96.3 | 10.1 |
| | SS-12 | (0-30") | 3,270 | 228 |
| | SS-12 | (30"-54") | 7,940/9,020 | 461/456 |
| Pit | SS-13 | (0-30") | 7,630 | 383 |
| щ | SS-13 | (30"-52") | 15,500 | 528 |
| | Pond Dredgings | ` , | 11,300 | 291 |

Note:

- Samples were collected on 9/10/96 and 9/11/96.
 Results of duplicate analysis are separated by a backslash.

Results of Chemical Analyses
October 17, 1989 Groundwater Samples
Lenox China, Inc.
Pomona, New Jersey

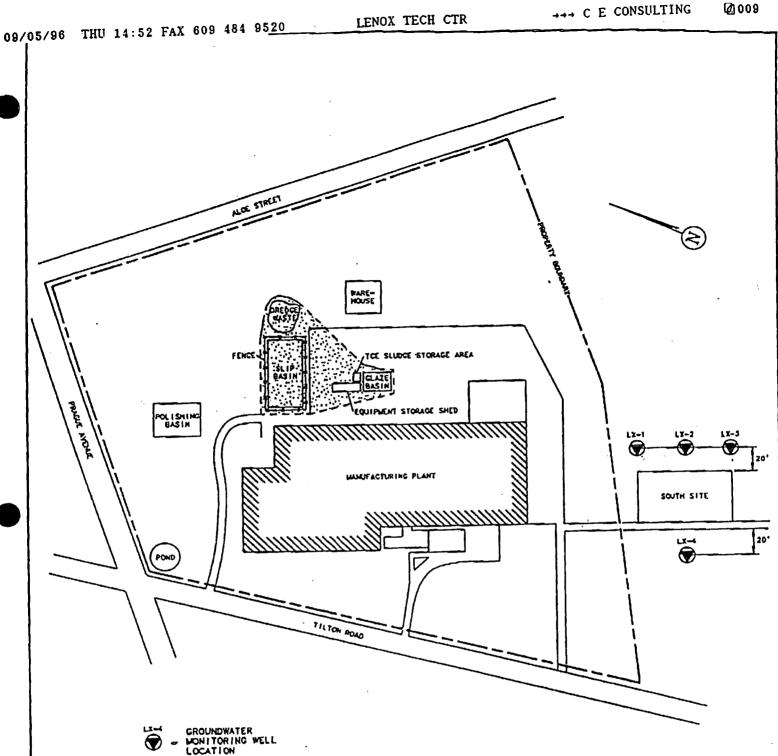
| | | Sample Identification | | | | | | |
|--------------------------------|----------|-----------------------|--------|-------|--------|------------|-------------|--|
| Parameter | Units | LX-1 | LX-2 | LX-3 | LX-4 | Trip Blank | Field Blank | |
| Total Lead | mg/l | 0.015 | 0.002 | 0.013 | <0.001 | <0.001 | <0.001 | |
| Dissolved Lead | mg/l | 0.004 | <0.001 | 0.001 | <0.001 | <0.001 | <0.001 | |
| pH | pH units | 5.70 | 5.30 | 4.10 | 4.80 | 6.40 | 6.90 | |
| Specific Conductance @ 25°C | µmhos/cm | 290 | 1,500 | 1,100 | 45 | 2 | 2 | |
| Trichloroethene(1) | μg/1 | <0.1 | <0.1 | <0.1 | <0.1 | <0.1 | <0.1 | |

⁽¹⁾ EPA Method 601.

→→→ C E CONSULTING

Table 2 Groundwater Volatile Organic Analysis Data
August 31, 1989 Samples
Lenox China, Inc.
Pomona, New Jersey

| | | | Sample Identification | | |
|---------------------------|-------|---------------|-----------------------|---------------|-----------------|
| Parameter | Units | LX-1 | LX-2 | LX-3 | LX- |
| olatile Organic Analyses: | | | | | |
| Acrolein | g/1 | <250 | <250 | <250 | <250 |
| Acrylonitrile | g/1 | <250 | , <250 | <250 | <250 |
| Benzene | g/1 | < 5 | < 5 | <5 | < 5 |
| Carbon Tetrachloride | g/l | < 5 | < 5 | <5 | < 5 |
| Chlorobenzene | g/l | < 5 | <5 | <5 | < 5 |
| 1,2-Dichloroethane | g/1 | <5 | <5 | < 5 | <5 |
| 1,1,1-Trichloroethane | g/1 | < 5 | < 5 | <5 | < 5 |
| 1,1-Dichloroethane | g/1 | <5 | <5 | < 5 | <5 |
| 1,1,2-Trichloroethane | g/1 | < 5 | <5 | < 5 | <5 |
| 1,1,2,2-Tetrachloroethane | g/1 | < 5 | < 5 | < 5 | < 5 |
| Chloroethane | g/1 | <5 | < 5 | < 5 | <5 |
| 2-Chloroethylvinyl Ether | g/1 | < 5 | < 5 | <5 | <5 |
| Chloroform | g/1 | < 5 | <5 | < 5 | < 5 |
| 1,1-Dichloroethene | g/1 | < 5 | < 5 | <5 | < 5 |
| Trans-1,2-Dichloroethene | g/1 | <5 | <5 | <5 | <5 |
| 1,2-Dichloropropane | g/l | < 5 | < 5 | < 5 | · < 5 |
| 1,3-Dichloropropene | g/1 | < 5 | < 5 | <5 | < 5 |
| Ethylbenzene | g/1 | <5 | < 5 | < 5 | < 5 |
| Methylene Chloride | g/1 | < 5 | <5 | <5 | <5 |
| Chloromethane | g/1 | < 5 | < 5 | <5 | < 5 |
| Bromomethane | g/1 | . <5 | <5 | <5 | <5 |
| Bromoform | g/1 | <5 | < 5 | <5 | <5 |
| Dichlorobromomethane | g/l | <5 | <5 | <5 | <5 |
| Chlorodibromomethane | g/1 | <5 | <5 | <5 | <5 |
| Tetrachloroethene | g/l | < 5 | < 5 | < 5 | <5 |
| Toluene | g/1 | <5 | <5 | <5 | <5 |
| Trichloroethene | g/1 | <5 | < 5 | < 5 | <5 |
| Vinyl Chloride | g/1 | < 5 | < 5 | < 5 | <5 |



DRAWING NOT TO SCALE

FIGURE 1

GROUNDWATER MONITORING WELL LOCATION PLAN

PREPARED FOR

LENOX, INC. LAWRENCEVILLE, NEW JERSEY

APPROVED LINE 11/4/8 CHECKED TOLE 11116



Certifications South Site Remedial Action Plan Lenox Incorporated Pomona, New Jersey

The following certification shall be signed by the highest ranking individual with overall legal responsibility for implementing the remediation of a site, but shall not A. include contractors or consultants:

"I certify under penalty of law that the information provided in this document is true, accurate, and complete. I am aware that there are significant civil penalties for knowingly submitting false, inaccurate or incomplete information and that I am committing a crime of the fourth degree if I make a written false statement which I do not believe to be true. I am also aware that if I knowingly direct or authorize the violation of any statute, I am personally liable for the penalties." Senior Vice President and

President, Title Lenox Operations Printed Name Jerome J. Ciszewski Notary Signature TRANCES F. BENISHENS Notary Public of New Jersey

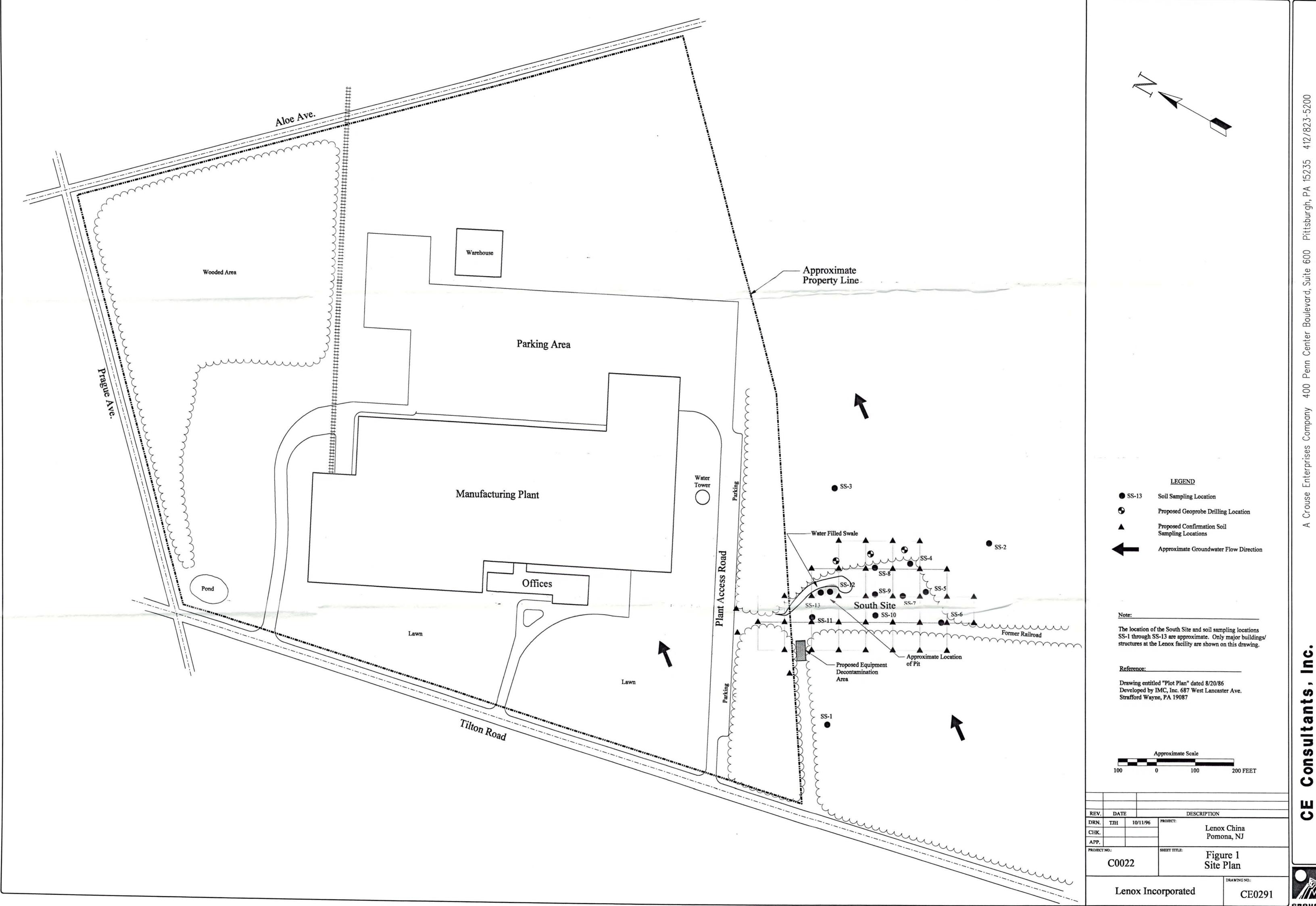
My Commission Expires June 20, 1998

B. The following certification for a corporation shall be signed by a principal executive officer of at least the level of vice president.

"I certify under penalty of law that I have personally examined and am familiar with the information submitted herein and all attached documents, and that based on my inquiries of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant civil penalties for knowingly submitting false, inaccurate or incomplete information and that I am committing a crime of the fourth degree if I make a written false statement which I do not believe to be true. I am also aware that if I knowingly direct or authorize the violation of any statue, I am personally liable for the penalties.

Vice President, Title Secretary and Lenox Counsel Printed Name Date _ 10 /17 Date _ Notary Signature _

> FRANCES P. BENISH Notary Public of New Jersey My Commission Expires June 20, 1998



Cro V ultant S 5

AMENDMENT TO MEMORANDUM OF AGREEMENT IN THE MATTER OF THE TILTON ROAD SITE AND LENOX CHINA DATED OCTOBER 11, 1995 - CASE NO. 95-6-29-0905-37

The above captioned Memorandum of Agreement will be amended as follows:

- For purposes of this Memorandum of Agreement a certain portion of Block 453, 1.1. Lot 2 on the tax maps of the Township of Galloway, Atlantic County, New Jersey as shown on attached Figure 1 shall hereinafter be referred to as the "South Site".
- Paragraph 6 above shall apply to the Site as defined in Paragraph 1 of this 6.1. Memorandum of Agreement. As to the South Site defined in Paragraph 1.1. above, Lenox China agrees to submit and the Department agrees to review and approve the following documents:
 - Remedial Action Workplan. a.
 - Remedial Action Report for Remedial Action Workplan activities within b. thirty (30) calendar days after completion of Remedial Action Workplan activities.
- The Department agrees that no further Remedial Investigation is necessary with 6.2. respect to the South Site and that the cost summary described in Paragraph 12 of this Memorandum of Agreement is not required for the South Site.

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

Date: By: Mark J. Pedersen, Section Chief DRPSR Case Assignment Section

LENOX CHINA

By:

Jerome J. Ciszewski

Print Full Name Signed Above

Senior Vice President and President, Lenox Manufacturing Operations Title



State of New Jersey

THE PINELANDS COMMISSION PO BOX 7 NEW LISBON NJ 08064 (609) 894-9342



CHRISTINE TODD WHITMAN

CERTIFICATE OF FILING

January 2, 1997

Louis Fantin
Lenox, Incorporated
100 lenox Drive
Lawrenceville, NJ 08648

Please Always Refer To This Application Number

RE: App. No. 87-0690.10 Block 453, Lots 1 & 2 Galloway Township

Dear Mr. Fantin:

This application for the removal of approximately 800 cubic yards of contaminated soils and debris from the above referenced 94.34 acre parcel in Galloway Township is complete. There is an existing manufacturing plant on Block 453, lot 1. The parcel is located in a Regional Growth Area.

The completion of this application has resulted in the issuance of this Certificate of Filing. This Certificate of Filing is required before any other agency can deem an application complete and take action on your proposed development. The agency may proceed to review and take action on the proposed development. The agency must give notice to the Pinelands Commission of any modification of the proposed development and of any approval received for the proposed development within 5 (five) days of the granting of an approval.

The site of the clean-up was previously used for the storage of plaster molds and broken china from the manufacturing facility that is located on Block 453, Lot 1. The proposed remedial activities will consist of the excavation and off-site disposal of approximately 800 cubic yards of contaminated soil. Also proposed is the removal of china and plaster chips in the upper proposed is the removal of china and plaster chips in the upper six inches of soil at portions of the site. Ponded water containing trace concentrations of lead in an existing swale within the contaminated area will be pumped into the sanitary sewer sys-



14.

tem and conveyed to the Atlantic County Utilities Authority Treatment Plant.

The Site Plan, consisting of Figure 1 in the October 16, 1996 Remedial Action Work Plan, was prepared by CE Consultants, Inc. and dated October 11, 1996.

An application for a golf course and residential development, including the above referenced parcel was previously completed with the Pinelands Commission. The proposed golf course and portions of the residential areas of the application were approved pursuant to the provisions of the Pinelands Comprehensive Management Plan (App. No. 87-0690.01). Local approvals that were issued for portions of the residential development included in that application are currently subject of a Commission staff review.

Application Numbers 87-0690.02, 87-0690.03, 87-0690.04, 87-0690.06, 87-0690.07 and 87-0690.09 concern the development of improvements associated with the club house, golf course and residential development that are the subject of App. No. 87-0690.01.

An application for a Letter of Interpretation concerning the number of Pinelands Development Credits necessary for the residential development subject of App. No. 87-0690.01 was initiated, but not completed, with the Pinelands Commission (87-0690.05).

Applications for the closure of existing glaze basins used in the manufacturing of china on Block 453, Lot 1 (App. No. 85-0666.01), the remediation of groundwater (App. No. 85-0666.02), the closure of a slip basin (App. No. 85-0666.03), the modification of a discharge monitoring structure (App. No. 85-0666.04) and the remediation of contaminated soil (App. No. 85-0666.05) on the lot were previously completed with the Commission.

This application is for the proposed remedial activities only. Any future development such as the construction of a new stormwater retention facility shall be governed by the provisions of the Pinelands Comprehensive Management Plan.

If it is determined that there is any residual contamination of soil or groundwater at the site, the applicant shall notify the Pinelands Commission and the Department of Environmental Protection of this fact. The applicant shall be responsible for initiating the necessary application to the Commission for cleaning up the site within 30 days of discovery of any residual contamination.

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No degradation of water quality shall occur. Copies of the results of all groundwater sampling and groundwater monitoring reports shall be submitted to the Pinelands Commission. If the results indicate that the proposed soil remediation is not adequate to protect groundwater from degradation, an application for groundwater remediation shall be submitted to the Pinelands Commission.

Landscaping shall adhere to the requirements of the Pinelands Comprehensive Management Plan. All disturbed areas shall be revegetated within 6 months of completion of construction with sufficient vegetation to stabilize soils.

The soil and china chips removed from the parcel shall be disposed of, treated or re-used at a location outside of the Pinelands Area. A separate application shall be submitted for the placement of this soil on any land within the Pinelands Area.

THIS CERTIFICATE OF FILING IS NOT AN APPROVAL. It is the letter necessary for other agencies to review and act on your application. If either a municipal or county agency grants an approval or permit for the proposed development, that approval is subject to review by the Pinelands Commission. No local approval shall take effect and no construction or development shall occur unless written notice from the Pinelands Commission has been received, indicating either that the Commission will not review the local approval or that the Commission has approved the local approval.

This Certificate of Filing is transferable to future owners of this parcel.

If you have any questions, please contact the development review staff.

Sincerely,

William F. Harrison, Esq.

Assistant Director

TD cc:

Secretary, Galloway Township
Galloway Township Construction Code Official
Atlantic County Policy, Planning and Economic
Development Office

Frank Faranca Kathleen Swigon Todd DeJesus Gina Berg



State of New Jersey

Christine Todd Whitman Governor

Department of Environmental Protection

Division of Water Quality 401 East State Street CN-029 Trenton NJ 08625 Fax: (609) 984-7938 Robert C. Shinn, Jr.

Commissioner

JAN 22 1997

By

Mr. John Kinkela, Director,
Environmental Engineering
Lenox Technical Services
Tilton Road
Pomona NJ 08240

January 17, 1997

CERTIFIED MAIL
RETURNED RECEIPT REQUESTED

Dear Mr. Kinkela

RE: Lenox China Facility

Galloway Township, Pomona, Atlantic County

On January 15, 1997, the Department of Environmental Protection received a copy of a letter dated January 13, 1997 which was addressed to you from Richard S. Dovey, President of the Atlantic County Utilities Authority (ACUA). That letter specifies the conditions under which ACUA is willing to accept a temporary discharge of 100,000 gallons per day for a period of ten days from the subject facility incidental to remediation of the site under supervision of the Department's Site Remediation Program.

In lieu of an individual NJPDES/SIU permit for the proposed activity, the Division of Water Quality hereby allows the proposed temporary discharge, as specified in and subject to all conditions set forth in the referenced letter dated January 13, 1997 and conditions incorporated therein from a letter dated November 27, 1996 by Churchill Associates, consulting engineer for the Galloway Township Utilities Division.

Upon expiration of this temporary permission, discharge to ACUA in excess of 25,000 gallons daily may require Lenon to obtain an individual NJPDES/SIU permit.

If you have any questions regarding this matter please contact Nilesh Naik of the Bureau of Pretreatment and Residuals at (609) 633-3823 or by letter through this office.

FAX 984-7238

Sincerely,

Dennis Hart, Director Division of Water Quality

DWQ181: gjt

` ".

Richard P. Dovey, ACUA Rick Wehrhan, ACUA

Steven Bonanni, Galloway Township

Frank Faranca, NJDEP Division of Responsible Party Site Remediation



itic County Utilities Authority

1701 Absecon Blvd. • Atlantic City, New Jersey 08401

phone: (609) 348-5500 • fax: (609) 343-7760 • WEB: http://www

January 13, 1997

Mr. John Kinkela, Director, Environmental Engineering Lenox Inc. 100 Lenox Drive Lawrenceville, NJ 08648

RE:

Lenox China Temporary Remedial Wastewater Discharge Lenox China Facility Galloway Township, Pomona, Atlantic County

Dear Mr. Kinkela:

The proposed project involves remediation of contaminated soils at or adjacent to the Lenox China Facility in Pomona, Galloway Township. Prior to excavation and disposal of contaminated soils in accordance with a Remedial Action Work Plan, dewatering of the site is necessary. Because the water is contaminated with lead, connection to the sanitary sewage system and treatment by the ACUA is being proposed.

We have reviewed the above referenced request for temporary discharge into the ACUA sanitary sewerage system. Based upon information provided by your office dated December 2, 1996, this project is expected to contribute 250,000 gallons (initially) of surface water at a rate of 100,000 gallons per day (gpd) and 100,000 gpd of groundwater thereafter for a period of 10 days. The information provided also indicates that the amount of lead in the water is less than 0.6 milligrams per liter. However, according to the support documentation, lead contained in the soil to be excavated contains levels of lead significantly in excess of levels present in the water.

The proposed discharge will be transmitted through the Galloway Township wastewater conveyance system before being discharged into the ACUA system. The Galloway Township Utilities Division has agreed to accept the subject discharge subject to certain provisions outlined by their consulting engineer, Churchill Associates, in a letter dated November 27, 1996.

Because the estimated flow volumes are expected to exceed thresholds that usually require NJDEP Treatment Works Approval (TWA) and Significant Indirect User (SIU) Permits, determinations by ACUA with respect to the proposed discharge are subject to the findings and satisfaction of the Department in this regard.

Lenox China Temporary Discharge January 13, 1997 Page 2

We acknowledge receipt of a letter from the NJDEP Site Remediation Program dated December 11, 1996 that deems the proposed discharge to have a Treatment Works Approval permit equivalent as a result of the work being conducted under the supervision of the Department under the terms of a Memorandum of Agreement. It is our understanding that the SIU Permit is to be addressed following the issuance of an affirmative finding by ACUA. The SIU permit (or equivalent) must be forwarded to ACUA (to the attention of Rick Wehrhan) prior to start of discharge.

In accordance with your letter dated January 9, 1997 in response to our letter dated December 19, 1996, the proposed discharge will be pre-treated to meet the ACUA discharge limits of 0.6 mg/l for lead and between 5 and 9 units for pH. The discharge will be metered, sampled and analyzed daily for total lead, TSS and pH and the results will be transmitted daily to Gary Grant.

Based upon current loadings the temporary discharge to be generated by the referenced project, consisting of surface and ground water, at a rate and for a period specified above, can presently be accommodated by all affected ACUA facilities under the following conditions:

- 1. The discharge must be metered and cannot exceed 100,000 gpd for a period longer than that specified unless prior written approval is issued by ACUA.
- 2. The discharge must be sampled and analyzed for Total Lead, Total Suspended Solids (TSS) and pH daily. Total lead and TSS samples are to be 24 hour composites and the pH will be a field analyzed grab.
- 3. Results of the lab analysis and total flows are to be reported daily to Gary Grant, Assistant Operations Director, via FAX at 344-6609.
- 4. The following levels are maximum discharge limits that cannot be exceeded:

Total Lead 0.6 Mg/Kg
TSS 500 Mg/Kg
PH Over 9 or less than 5 standard units

Discharge to be discontinued and ACUA to be notified immediately if and when exceedences occur. Once ACUA is satisfied with corrective action then discharge may resume.

Lenox China Temporary Discharge January 13, 1997 Page 3

- 5. ACUA representatives may visit the site at any time without notice to observe the operation and perform confirmatory sampling and analysis activities.
- 6. Gary Grant or his designee is to be notified (348-5500) at least 72 hours in advance of start of initial discharge and each time the discharge stops or resumes until the project is completed.
- 7. The ACUA must review changes in the project that would effect the waste water discharge quality and quantity. In no case may the project discharge exceed ACUA "Schedule B" parameters without prior written authorization from ACUA and NJDEP. Please note that ACUA may require additional measures, such as a sampling plan, to assure compliance with ACUA standards. The ACUA can at any time for any reason discontinue acceptance of the discharge if it is in the ACUA's best interest to do so.

It should be noted that our review is not in regard to engineering detail or conveyance of the flows from the project to the ACUA system. We would rely on the Local Provider and State of New Jersey Department of Environmental Protection for technical review and local sewer service availability.

Should you have any questions, please feel free to contact Rick Wehrhan at 348-5500.

Sincerely yours,

ATLANTIC COUNTY UTILITIES AUTHORITY

Richard S. Dovey

President

c: Frank Faranca, NJDEP, Division of Responsible Party Site Remediation Nilish Niak, NJDEP, DWQ, Bureau of Pretreatment and Residuals Stephen Bonanni, Galloway Township Richard Catando, ACUA Rick Wehrhan, ACUA Bill Hiller, ACUA Gary Grant, ACUA Tom Ganard, ACUA File - lenox.tmp



State of New Jersey

Christine Todd Whitman

Department of Environmental Protection

Robert C. Shinn, Jr. Commissioner

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
NO. 2288 500 890

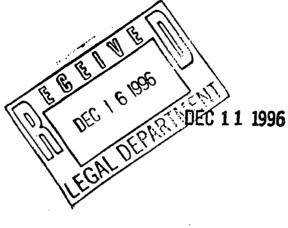
Mr. Louis A. Fantin, VP Lenox Incorporated 100 Lenox Drive Lawrenceville, N.J. 08648

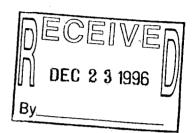
Dear Mr. Fantin:

Re: Lenox China Facility

Atlantic County Utilities Authority/Treatment Works Approval

Galloway Township, Atlantic County





The New Jersey Department of Environmental Protection (Department) received a copy of a correspondence from Lenox China, Inc. (Lenox) to the Atlantic County Utilities Authority (ACUA) dated December 2, 1996 regarding the temporary connection for wastewater generated from the remedial activities at the Lenox South Site. The estimated initial volume of water to be removed from an on-site depression will be 250,000 gallons and a daily volume of water thereafter estimated to be 100,000 gallons for the duration of the remedial activity estimated to be 10 working days. This water contains a trace concentration of lead (less than 0.6 mg/l) and therefore can not be reinjected back into the aquifer. It is the Department's understanding that a Treatment Works Approval is necessary for the conveyance system in order for the ACUA to accept this waste water and exceed their current limitation of 8,000 gallons per day per connection. The Director of Public Works for Galloway Township has approved this temporary discharge as to the quantity and quality of the water in their November 27, 1996 correspondence from the Township Engineer.

The Department has reviewed this proposal pursuant to the November 27, 1996 Amendment to the Memorandum of Agreement between the Department and Lenox and has determined that the ACUA and Lenox is deemed to have a Treatment Works Approval for this temporary discharge as a permit equivalent. Lenox and ACUA is also being informed that this permit equivalent is only allowed because the work is being conducted under the supervision of the Department's Site Remediation Program and the above mentioned Memorandum of Agreement.

Should you have any questions, please contact me at (609) 984-4071.

Frank Faranca, Project Manager

Bureau of Federal Case Management

c: Andrew Park, USEPA, Region II
Daryl Clark, NJDEP/DPFSR/BGWPA
Rick Wehrhan, ACUA
Todd DeJesus, Pinelands Commission

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CHURCHILL

NOV 2 1996

Consulting Engineers

A Professional Corporation

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E-mail amc@interserv.com

November 27, 1996

Mr. Stephen J. Bonanni, Director of Public Works Galloway Township 300 E. Jimmie Leeds Road Galloway, NJ 08201

Re:

Lenox China

Temporary Remedial Wastewater Discharge Galloway Township, Atlantic County, NJ Our File No. GU96003

Dear Steve:

As requested, we have reviewed Lenox Chinas' proposal to discharge wastewater from their lead remediation project into the Township sewerage system, as set forth in the attached letter of November 22, 1996.

This flow would be pumped into the Aloe Street force main and through the Pomona Pumping Station over a period of about two (2) weeks. Our concerns are two-fold. First, the ability of the station to accept the estimated 100,000 gallons per day of flow is uncertain. Secondly, there is a possibility that the wastewater may contain grit.

We have discussed these concerns with John F. Kinkela, Director of Environmental Engineering of Lenox. Mr. Kinkela agreed to the following:

- 1. Flow introduced into the system will be reduced (and/or stopped) in the event that a backup of wastewater is observed at the Pomona Pumping Station until such time that normal conditions resume. Mr. Kinkela indicated that the initial pumping would be scheduled over a weekend when the normal Lenox flow is low and that the Township would be provided with a contact for 24-hour response.
- 2. Lenox will be responsible for any damage to the Township facilities caused by their discharge (i.e. grit damage to pumps, etc.).

Mr. Stephen J. Bonanni, Director of Public Works November 27, 1996 Page 2 of 2

With these conditions, we would have no objection to the Township allowing the temporary discharge.

If you have any questions or require additional information, please feel free to contact our office.

Very truly yours,

CHURCHILL, P.C.

Ernest G. Lemmerman, P.E.

Project Manager

EGL:dd Enclosure

cc: Mr. Andrew S. Katz, Township Manager

Mr. John F. Kinkela, Lenox

APPENDIX B

EXPEDITED FIELD TEST PROCEDURES

CLEAN SOIL EVALUATION, SOUTH SITE

The following sampling protocol and test procedures will be used to control final contaminated soil clean up at the South Site. Samples will be collected and analyzed for total lead to determine the amount of soil that must be removed to achieve an acceptable contaminate level.

The area is laid out in 70 ft. square grid sections. The first phase will be to test each grid section to determine the depth of soil that must be scraped off the top to get to a clean soil level.

The second phase will be to determine how the soil must be handled, (disposed of or put back in place), after scraping and screening.

Initial sample locations are indicated on a grid drawing prepared by Gary Berman. Samples will be collected to a depth of 12 inches.

The second phase of testing will be to collect samples from each of the piles generated by the scraping/screening operation. It will be determined at this point whether the screened soil will be removed for disposal or put back in place.

This procedure does not follow standard procedures for total lead analysis. Sample preparation, digestion, filtration and glassware clean up are altered to expedite test data turn-around. This is necessary to keep the flow of work continuous from one grid section to the next.

SAMPLE COLLECTION

1.0 Preparing Split Spoon Sampler

Scrub Split Spoon Sampler with tap water, then rinse with DI water.
*Note: This procedure shall be followed prior to collecting each sample.

2.0 Collecting sample

- 2.1 Position a barrier ring so that the split spoon sampler will penetrate the ground surface in the center of the ring. Measure and record the average depth of the dirty soil.
- 2.2 Remove all dirty soil and loose dirt from inside the ring.
- 2.3 Place point of spilt spoon in center of ringed area and carefully drive to a depth of 12 inches.
- 2.4 Remove split spoon sampler, place on a clean surface and open. Take care that all material remains in place in the split spoon.
- 2.5 Put the top 3 inch section of the sample from the split spoon into a container and mark for identification.
- 2.6 Repeat step 2.5 above to collect the next 3 inch and 6 inch sections.

The collected samples are now ready for analysis. The top 3 inch section will be analyzed first. If this sample does not show clean soil results, the next 3 inch section shall be analyzed. If this sample also does not show clean soil, analyze the last 6 inch sample section. The results of this sample will determine whether sampling at a deeper depth will be necessary or how to handle the soil in this pile of screened material.

SAMPLE ANALYSIS PROCEDURE

1.0 Sample preparation

- 1.1 Thoroughly mix collected sample.*Note: Sample will be wet and may need to be chopped up for mixing.
- 1.2 Spread sample out and quarter. Take equal amounts from each quarter to provide at least a 100 gram sample.
- 1.3 Spread out the 100 gram sample and quarter.
- Take equal amounts from each quarter to provide an approximately 5,000 milligram sample and place in a 125 ml Phillips Beaker. Record the actual weight (W).

2.0 Clean Glassware

- 2.1 Glassware shall be washed with Lab detergent, rinsed with tap water and a final rinse with DI water.
- 3.0 Hot Nitric Acid Digestion and preparation of sample for reading on AA.
 - 3.1 Add 15 ml of concentrated nitric acid to sample in 125 ml Phillips beaker.
 - 3.2 Heat sample gently on a hot plate for 30 minutes. Remove from heat and let cool.
 - 3.3 Bring initial volume (V_I) of sample up to 0.1L (100 ml) with DI water. MIX THOROUGHLY and let stand to settle.
 - 3.4 Decant digested solution through a 0.45 micron filter. DO NOT wash sediment into filter.
 - Put a 10 ml aliquot of filtrate (V_F) into a 50 ml (V₁) volumetric flask to make a 5:1 dilution. (This 5X dilution puts a sample with 100 to 800 ppm of total lead in range for an AA calibrated with 1 mg/l to 8 mg/l calibration standards.)

4.0 Sample analysis by "AA"

- 4.1 Sample shall be analyzed on the Atomic Absorption Flame Spectrometer following standard procedures for lead analysis.
- 4.2 If the reading (R) is high (greater than 8.0 mg/L), then the sample must be diluted 10:1 or 5:1, using DI water, to bring it within the spectrometer's working sensitivity range. For each dilution (N), record both the aliquot (V_{AN}) and dilution (V_(N+1)) volumes.

- 5.0 Calculation of final Sample Concentration
 - 5.1 If the initial sample from step 3.5 was read on the AA without further dilutions then the dilution factor (DF) is:

DF = $5 = V_1/F_V$, where V_1 = dilution volume, F_V = volume of filtrate. = 50 ml/10 ml.

5.2 If it was necessary to make additional dilutions to obtain an AA reading in the calibration range, the final dilution factor is calculated by multiplying dilution factors.

$$DF = V_1/F_V * V_2/V_{A1} * V_3/V_{A2} * ... * V_{(n+1)}/V_{An}$$

where: $V_1/F_V = 5$ from the dilution in step 3.5 $V_{AN} = \text{volume of aliquot taken from dilution volume } V_1$ $V_N = \text{volume of final dilution step } N$.

5.3 Calculate the final Sample Concentration (C) in the fully diluted AA sample which gave the final AA reading.

(e.g. for 5.1)

$$C = 5,000 \text{ mg/}(100 \text{ ml} * 5) = 1,000 \text{ mg/}0.1L = 10,000 \text{ mg/}L$$

- 6.0 Calculation of Test Results
 - 6.1 The "AA" reading is in units of mg/L based on the standard calibration curve used for lead analysis.
 - The results are used to back calculate the total lead concentration (X) in the original 5,000 milligram sample using the following formula:

 $X = R/C * 10^6/10^6 = concentration of lead in the soil sample in parts per million (ppm);$

where: R = AA reading in mg/L from step 4.0; C = concentration of the original sample in the fully diluted digestion sample from step 5.3.

e.g. if R = 5 mg/L and C = 10,000 mg/L then the mg/L's cancel out and: $X = R/C * 10^6/10^6 = (5 * 10^6) / (10^4 * 10^6) = (5 * 10^2) / 10^6 = 500$ ppm.

APPENDIX C

GEO-PROBE ANALYTICAL RESULTS AND METHODOLOGY

LENOX CHINA POMONA, NEW JERSEY

APPENDIX C

GROUNDWATER SAMPLING PROCEDURES

Gannett Fleming retained Zebra Environmental to collect groundwater samples using Geoprobe direct push equipment. The site investigation work was supervised by Mary Redican, a Gannett Fleming Engineer, and Daryl Clark, an NJDEP Project Geologist.

Groundwater samples were collected by inserting stainless steel screen and food grade Tygon tubing into the outer drive casing, driving the outer casing to approximately 14 feet below grade (depth to groundwater was anticipated to be approximately 12 feet below grade). The outer casing was pulled back to expose the 6-inch section of screen. A peristaltic pump was used to purge a small volume of water until a relatively clear discharge was obtained. The groundwater samples were collected directly from the pump discharge tubing into sample containers provided by the laboratory.

The equipment was cleaned between borings by removing soil using a wire brush, washing the casing and screen with Alconox and potable water, rinsing with potable water and rinsing with distilled water. Dedicated Tygon tubing was used for each groundwater sample.

GEO-PROBE - ANALYTICAL RESULTS

| Sample number | AccuTest Sample # | Accutest Results | In-house Test (ppm) | Date Collected | Sample Description |
|------------------|----------------------|---------------------|------------------------|-------------------|-------------------------------|
| GP-1 | E39740-5 | NA | 0.0190 | 09/21/98 | Geoprobe Lead and VOC samples |
| GP-1A | E39740-6 | <.0030 | <.0020 | 09/21/98 | Geoprobe Lead and VOC samples |
| GP-2 | E39740-3 | 0.0053 | 0.0031 | 09/21/98 | Geoprobe Lead and VOC samples |
| GP-3 | E39740-2 | <.0030 | <.0020 | 09/21/98 | Geoprobe Lead and VOC samples |
| GP-4 | E39740-1 | <.0030 | 0.0028 | 09/21/98 | Geoprobe Lead and VOC samples |
| FIELD BLANK | E39740-4 | <.0030 | NA | | |
| TRIP BLANK | E39740-7 | NA | NA | | |